

STEPHENS FAIR PROCESSING NOTICE
EFFECTIVE DATE: 25 MAY 2018

PURPOSE AND APPLICATION OF THIS NOTICE

Stephens Inc. and its affiliates (“Stephens,” “we,” or “us”) routinely collect and use information relating to identifiable individuals (“**personal data**”), including data relating to:

1. our clients and prospective clients, where these are individuals rather than legal entities (“**natural person clients**”);
2. the beneficial owners, partners and directors of our legal entity, partnership or fund clients and prospective clients;
3. the settlors, trustees, beneficiaries and protectors of the trusts (or similar legal arrangements) to which we provide services or to which we may seek to provide services;
4. advisors, managers, staff, intermediaries and other representatives of our clients and prospective clients (“**representatives**”); and
5. other persons affiliated or associated with our clients and prospective clients and their representatives, such as guarantors and family members.

We provide this fair processing notice (“**notice**”) in accordance with our obligations under the European Union’s General Data Protection Regulations, and as part of our commitment to processing personal data transparently.

This notice applies to you if (1) the Stephens entity or entities which contract(s) or seek(s) to contract with you or with the entity, partnership, trust or fund that you own, represent or are otherwise associated with is established in the European Union, or (2) you are located in the European Union and are a person with whom Stephens contracts or seeks to contract, or you are a beneficial owner, partner or settlor in respect of a Stephens client or prospective client.

I. CONTENTS

This notice provides information on:

- the Stephens entity or entities responsible for processing your personal data;
- the personal data we collect from you and from third parties about you;
- the purposes for which personal data is processed and our lawful basis for doing so;
- how your personal data is shared by us; and
- your rights in relation to our processing of your personal data, and how you can exercise these rights.

II. CONTACT DETAILS

Stephens Europe

For Stephens Europe Limited clients, please email at data.protection@stephenseurope.com.

Stephens Inc. and Affiliates

For clients of any other Stephens affiliate, please contact stephens-privacy@stephens.com.

1. WHO IS RESPONSIBLE FOR YOUR PERSONAL DATA?

The Stephens entity which contracts, or seeks to contract, with you or with the entity, partnership, trust or fund that you own, represent or are otherwise associated with will be a data controller of your personal data. In addition, where processing of personal data is undertaken by an entity controlled by, or under common control with, Stephens (a “**Stephens affiliate**”) for their own independent purposes, these Stephens affiliates may also be data controllers of your personal data.

The list of Stephens controllers, their contact details, and, where applicable, those of their representatives are set out in Appendix 1 to this notice.

This notice applies in conjunction with any other notices you receive from Stephens affiliates in connection with the processing of your personal data.

2. WHAT PERSONAL DATA DO WE PROCESS?

2.1. YOUR PERSONAL DATA

Stephens and Stephens affiliates will, depending on the relationship we have with you and the products and services we provide (or seek to provide), process certain personal data relating to you and people connected to you, including the data listed below.

A. PROFESSIONAL AND PERSONAL DETAILS Applicable to all recipients of this notice

We process your name and contact information. We may also hold details of your preferences regarding how we communicate with you, and information we need to identify you when you contact us.

A. Applicable to client representatives and prospective client representatives

The contact details we process will be your professional contact details. In addition, we process details of the client you represent, your role as a client representative and information that allows us to communicate with you in connection with this role, such as evidence of your authority to represent our client.

B. FINANCIAL DETAILS AND INVESTOR PROFILE, INCLUDING TAX-RELATED INFORMATION

Applicable to natural person clients, beneficial owners, partners, trustees, protectors and settlors

This may include your bank account details, personal financial information, financial standing and history, credit rating, the nature of our mandate and any discretion you permit us, investment preferences, restrictions and objectives (including your personal circumstances, where relevant), job title, tax-related information and codes, information relating to your level of experience in investment matters, information relating to family members and trusted contacts, securities industry affiliations, and, if you apply for a product with us or service provided by us, details to enable us to assess your application.

A. Applicable to guarantors

This may include details of your financial standing and the guarantee you provide.

C. RECORDS CONNECTED WITH SERVICE PROVISION

Applicable to all recipients of this notice

This may include:

- notes from interactions, meetings and conversations that you have with us or our affiliates (including records of your instructions – whether for your own account or on behalf of the client you represent – and, to the extent permitted or required by law, recordings of telephone calls);
- records of correspondence and records of use of our websites, and/or our brokerage, financial or other services made available electronically by Stephens to you and/or the client you represent (including data transmitted by your browser and automatically recorded by our server);
- account details, records of agreements, payments, investments, trades and other transactions that contain your name or other personal data, and any identifiers that we or our affiliates assign to records associated with you; and

- details regarding your health if you provide us with this information in connection with account management or any needs you have when meeting or interacting with us.

D. INFORMATION USED FOR BACKGROUND CHECKS, MONITORING AND REGULATORY COMPLIANCE

Applicable to beneficiaries only

We may process details enabling us to honor your rights (including eligibility to payments) under the terms of the relevant trust, fund or similar arrangement and other details enabling us to meet our regulatory obligations, such as your date of birth, nationality and address.

Applicable to Principals only (see Appendix 2 for list of Principals)

We may process data such as your date of birth, nationality, country of residence, documents required for anti-money laundering checks and monitoring (including a copy of your passport or national identity card), records of any required disclosures, details of the origin of your wealth and of restrictions on your ability to invest (such as any insider status or political exposure), and other details of your affiliations and/or of our relationship with you as necessary to enable us to establish and meet applicable regulatory reporting requirements and identify any conflicts of interest.

Where required or authorized by applicable laws, this may involve processing data relating to any political affiliations you may have, as well as criminal convictions or allegations of offences.

In some cases we may obtain your personal data from Stephens affiliates or from third parties. Depending on the products and services we provide to you, this may include trade or transaction counterparts, credit reference agencies, public registers (such as beneficial ownership registers), financial crime screening databases, fraud prevention agencies, and persons or entities instructed by you to provide us with your personal data.

2.2. DATA RELATING TO THIRD PARTIES – RELEVANT TO PRINCIPALS

In addition to processing data on your representatives (as set out in this notice), in certain circumstances we may process personal data of persons connected to you but with whom Stephens does not directly communicate, such as dependents and family members. Additional information relating to our processing of their personal data is available online here: www.stephens.com/privacy-policy. Before you provide data relating to third parties, you should ensure you are permitted to do so and provide them with the information contained in that notice.

3. FOR WHAT PURPOSES AND WHICH LEGAL BASES DO WE PROCESS PERSONAL DATA?

3.1. PURPOSES FOR PROCESSING

Stephens and Stephens affiliates always process your personal data for a specific purpose and process only the personal data relevant for achieving that purpose. In particular, depending on our relationship with you and the products and services that we provide to you, we may process your personal data for the following purposes and for compatible purposes:

A. ACCOUNT OPENING

This includes processing data about you that we require in connection with opening your account or our client's account, such as identity verification information. This may include review and processing application and account opening documents and, if you are a Principal (see Appendix 2), conducting background prudential and regulatory compliance checks.

B. UNDERSTANDING CLIENT NEEDS AND OFFERING PRODUCTS AND SERVICES TO OUR CLIENTS

This includes assessing client suitability for products and services and making decisions regarding things such as risk appetite, tolerance, credit and strategy (where relevant to the products and services provided). If you do not contract directly with us for products and services, this may include communicating with and through you in connection with the offer of products and services to our client.

C. PROVIDING PRODUCTS AND SERVICES TO CLIENTS

This includes processing personal data to ensure the proper provision of our products and services, and keeping appropriate records, such as identity verification, transaction processing and keeping appropriate books, records and registers (such as documenting agreements and recording your instructions – whether for your own account or on behalf of the client you represent). If you are a beneficiary, this includes processing details enabling us to honor your rights (including eligibility for payments).

D. MANAGING OUR RELATIONSHIP WITH OUR CLIENTS AND CONNECTED PARTIES

This includes compiling and utilizing internal reports and notes, managing the client file, conducting risk reviews, allowing you to access our websites and secure online platform and other technological services, and, where applicable, managing any agreement or arrangement between us.

E. COMMUNICATING WITH YOU

Processing data required to communicate with you in person, by telephone, mail and email (including the issuance of statements and reports, where applicable), keep records of our communications with you, and manage any complaints.

F. CARRYING OUT OPERATIONAL AND ADMINISTRATIVE FUNCTIONS

This includes carrying out billing-related and payments administration; staff and access management; preparing business reports and accounts; operating information technology systems; archiving and backing up data; and transferring personal data.

G. HELPING US TO IMPROVE OUR PRODUCTS, SERVICES AND OPERATIONS

This includes conducting market research, analysis of client and prospective client preferences, transactions and market trends, evaluating potential new products and services, evaluating the effectiveness of our marketing, as well as testing new systems and upgrading existing systems. To the extent permitted by law, this may include recording telephone conversations, and monitoring emails and your use of our websites and of brokerage, financial or other services made available to you by Stephens electronically to assess, maintain and improve the quality of our services.

H. PRUDENTLY MANAGING OUR BUSINESS AND PROTECTING AND ENFORCING OUR RIGHTS

This includes assessing, monitoring and managing financial, reputational and other risks, conducting audits of our business, communicating with our regulator, protecting data used by our business and establishing, enforcing and defending against legal claims.

I. MARKETING

This includes direct marketing of products and services that we think may be of interest to you or to our client or prospective client (as applicable), including on behalf of Stephens affiliates and our strategic partners.

J. MEETING OUR REGULATORY AND COMPLIANCE OBLIGATIONS AND PREVENTING FINANCIAL CRIME

This includes:

- performing prudential and regulatory compliance checks on an ongoing basis;
- account and transaction monitoring, transaction reporting, tax reporting;
- monitoring our management of client accounts and client interactions;
- making disclosures to, and complying with requests from, public authorities, regulators, tax authorities, governmental bodies or law enforcement agencies, and investigating and preventing fraud and other crimes; and
- the extent permitted or required by law, recording telephone conversations and monitoring emails and your use of our websites and of brokerage, financial or other services made available to you by Stephens electronically.

We may also process data for other purposes we notify to you from time to time.

3.2. LEGAL BASIS FOR PROCESSING

The personal data processing described in this notice may be:

A. necessary in order to comply with our legal obligations under certain laws;

This applies to regulatory compliance checks referred to in parts A and J of section 3.1, assessment of client suitability referred to in part B of section 3.1, record keeping described in part E of section 3.1, reporting and creation of accounts referred to in part F of section 3.1, business management and regulatory liaison activities referred to in part H of section 3.1, and the processing described in part J of section 3.1, in each case where carried out in respect of the relevant laws.

B. necessary for entry into, or performance of, any contract(s) with you;

If you are a natural person client, this applies to the majority of the processing described in parts A – F of section 3.1 of this notice. If you act as an intermediary, this relates to processing to manage our agreement with you, referred to in part C of section 3.1.

C. necessary for the legitimate interest of Stephens or others, where these are not overridden by your interests or fundamental rights and freedoms (as described below); or

D. in limited circumstances and to the extent the legal bases for processing set out above do not apply, processed with your consent (which we obtain from you from time to time).

The “legitimate interests” referred to in section 3.2(c) above are:

- the processing purposes described in A – J of section 3.1 of this notice to the extent the processing is not necessary in order to (i) enter into contracts with you for the provision of these products and services and fulfil our obligations under such contracts, or (ii) comply with our legal obligations under certain laws;
- meeting and complying with our accountability requirements and regulatory obligations globally; and
- exercising our fundamental rights and freedoms, including our freedom to conduct a business and right to property.

E. DATA RELATING TO POLITICAL OPINIONS AND HEALTH

Applicable to Principals only (see Appendix 2 for list of Principals)

In addition, where we process data revealing your political opinions as part of our anti-money laundering checks and monitoring, we process this on the basis that you have (i) manifestly made such data public (to the extent this applies) or otherwise (ii) on the basis that this processing is necessary for reasons of the substantial public interest in preventing financial crime.

F. Applicable to all recipients of this notice

In addition, where we process data that you have provided to us regarding your health for the purposes of (i) managing your account in accordance with your wishes and interests (primarily relevant for natural person client) or (ii) meeting your needs in relation to any meetings or interactions with you (such as arranging wheelchair access), we will do so with your explicit consent (which we obtain from you from time to time).

In limited circumstances we may process any of the personal data we hold to the extent necessary to defend, establish and exercise legal claims.

G. DATA RELATING TO CRIMINAL CONVICTIONS AND OFFENCES

Applicable to all recipients of this notice

We process personal data relating to criminal convictions and offences as required or authorized by applicable law. For example, we may process data relating to actual or alleged criminal convictions and offences as part of checks and ongoing monitoring for anti- money laundering purposes (see parts A and J of section 3.1 of this notice).

4. YOUR CONSENT

To the extent Stephens is relying on your consent to process your personal data, you have the right to withdraw your consent to such processing at any time. You can do this by contacting your relationship manager or our data protection team at data.protection@stephenseurope.com (for clients of Stephens Europe Limited) or stephens-privacy@stephens.com (for all other Stephens affiliates).

Where you have withdrawn consent but Stephens retains the personal data we will only continue to process that personal data where necessary for those purposes where we have a different legal basis to do so. However, this may mean that we cannot continue to provide you with all or some of our services, in which case we may terminate the relevant service(s). Please note that this notice does not apply to consents you provide for any other reason, such as in connection with bank secrecy purposes.

5. SHARING PERSONAL DATA

Due to the size and complexity of Stephens' operations it is not possible to name each of our data recipients in this notice. However, Stephens only shares your personal data with the data recipients listed below. Depending on our relationship with you, we may share your personal data with:

- A. In respect of client representatives, the Stephens client you represent;
- B. Stephens affiliates (including custodians), external custodians and strategic partners;
- C. payment providers/recipients, beneficiaries, account nominees, intermediaries, and correspondent and agent banks;
- D. market counterparties, and parties interested in or assuming risk in connection with a transaction (such as issuers of investments), shareholders selling securities in any offering, co-managers, lead managers or any agent or advisor to any of the above;
- E. swap or trade repositories, swap data repositories or global trade repositories (or similar facilities or institutions), and stock exchanges;
- F. clearing houses, and clearing or settlement systems; and specialized payment networks, companies or institutions such as SWIFT;
- G. service providers who provide a service to or operate a system on behalf of Stephens or the institutions or entities referred to in this section 6 (including non-affiliated companies);
- H. Stephens' lawyers, auditors and accountants and others providing professional advice;
- I. relevant governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body under applicable laws of any relevant jurisdiction;
- J. your agents, representatives and other persons acting on your behalf or to whom you instruct or authorize us to disclose your data;
- K. with prospective purchasers and assignees in the event our business, or any part thereof, is sold or re-organized, or in the event that any product entered into with you is sold, transferred or assigned in whole or in part;
- L. any other person or entity Stephens reasonably thinks customary, necessary or advisable for the processing purposes described in this notice or to whom Stephens is obliged by applicable law or regulation to make the disclosure; and
- M. to any other party where we have first obtained your prior consent.

We will undertake a balancing exercise when we undertake such sharing and ensure that third parties with whom we work respect your privacy, this involves us thinking about the business case for retaining your records and about the impact that this may have on your privacy. If our relationship with you is subject to any banking secrecy rules and regulations, we only share your information as permitted under those laws, our agreement with you and/or any waivers you provide and this section 6 should be read accordingly.

6. INTERNATIONAL TRANSFER

The data sharing listed in this notice may involve the transfer of personal data to any country in which Stephens or a Stephens affiliate conducts business or has a service provider or to other countries for law enforcement purposes (including, without limitation, the United States of America and other countries whose data privacy laws are not as stringent as those in effect in the United Kingdom or the European Union).

Stephens will ensure that appropriate safeguards are in place to protect your personal data where these are required by applicable data protection laws and that transfer of your personal data is in compliance with such laws. Where required by applicable data protection laws, Stephens has ensured that service providers (including other Stephens affiliates) sign standard contractual clauses as approved by the European Commission or other supervisory authority with jurisdiction over the relevant data exporter. You can obtain a copy of any standard contractual clauses in place which relate to transfers of your personal data by contacting stephens-privacy@stephens.com (for Stephens Inc. and Affiliates) or data.protection@stephenseurope.com in the case of Stephens Europe Limited clients.

7. DIRECT MARKETING

The provision of your contact details for the purposes of direct marketing is voluntary and you do not need to provide such personal information in order to receive our services, but you may like to sign up so you get our newsletters and updates about events, its entirely up to you.

We will only contact you with regards to details of our services where you have indicated your express consent for us to do so.

You are entitled by law to object to use of your personal data for direct marketing purposes, including profiling to the extent that it is related to such direct marketing. You can opt- out of receiving any marketing emails by clicking the “unsubscribe” link in any such emails, filling out our [Contact Us Form](#) and selecting ‘opt-out,’ or by emailing us at Stephens-privacy@Stephens.com (for Stephens Inc. and Affiliates) or data.protection@stephenseurope.com in the case of Stephens Europe Limited clients.

If you are an existing subscriber to our mailing lists we will continue to market to you unless you tell us otherwise, as the new laws regarding marketing require us to think carefully about whether we have your permission to market to you, you may receive, or may have already received an email asking you if you still wish to receive such communications. We have sent this to make sure we don’t send you emails that you don’t want. If you don’t want to hear from us, please let us know and we will make sure you aren’t contacted again.

8. DATA SUBJECT RIGHTS

You are entitled by law to the following rights in respect of your personal data:

- A. **INFORMATION AND ACCESS:** You have the right to be provided with certain information about Stephens’ processing of your personal data and access to that data (subject to exceptions).
- B. **RECTIFICATION:** If your personal data changes, we encourage you to inform us of the change. You have the right to require inaccurate or incomplete personal data to be updated or corrected.
- C. **ERASURE:** You have the right to require that your data be erased in certain circumstances, including where it is no longer necessary for us to process this data in relation to the purposes for which we collected or processed the data, or if we processed this data on the basis of your consent and you have since withdrawn this consent.
- D. **DATA PORTABILITY:** Where we process your personal data on the basis of your consent, or where such processing is necessary for entering into or performing our obligations under a contract with you, you may have the right to have the data transferred to you or another controller in a structured, commonly used and machine-readable format, where this is technically feasible.
- E. **RIGHT TO OBJECT TO CERTAIN DATA PROCESSING:** To the extent that Stephens is relying upon the lawful basis of legitimate interest to process your personal data, then you have the right to object to such processing, and Stephens must stop such processing unless we can either demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms or where Stephens needs to process the data for the establishment, exercise or defense of legal claims. Normally, where

Stephens relies upon legitimate interest as a basis for processing we believe that we can demonstrate such compelling legitimate grounds, but we will consider each case on an individual basis.

- F. **RIGHT TO RESTRICTION OF PROCESSING:** You have the right to restrict Stephens' processing of your personal data while your request for data rectification or objection to personal data processing is being considered, if we no longer need to process your data but you need that data in connection with a legal claim, or if our processing is unlawful but you do not want us to erase the data. If this right applies, we will continue to store your data but will only further process it with your consent, for the establishment, exercise or defense of legal claims, to protect the rights of another person, or for reasons of important public interest.
- G. **RIGHT TO WITHDRAW CONSENT:** To the extent that Stephens is relying upon your consent to process personal data, you have the right to withdraw such consent at any time. Please see section 6 of this notice.
- H. **COMPLAINT:** You also have the right to lodge a complaint with a supervisory authority, in particular that in your Member State of residence, where applicable.

If you wish to exercise any of these rights you may do so by sending an email to Stephens-privacy@Stephens.com, or, in the case of Stephens Europe Limited: data.protection@stephenseurope.com. Alternatively you can send a written request to the Stephens entity with which you have a relationship, clearly marked "Individual Rights – FAO Privacy Team," using the address listed for that entity in Appendix 1 to this notice.

The letter should be accompanied, in the case of a request for further information and/or access, by a copy of your passport or other valid means of identification. We may provide additional ways for you to exercise your rights from time to time.

Please note that we may ask you to provide a form of identification verification before we can give effect to any such request made by you and such requests will always be subject to our legal obligations and lawful grounds of processing.

9. RETENTION OF PERSONAL DATA

Stephens and Stephens affiliates retain personal data for varying time periods in order to assist us in complying with legal and regulatory obligations, to enable compliance with any requests made by regulators or other relevant authorities and agencies, to enable us to establish, exercise and defend legal rights and claims, and for other legitimate business reasons.

Stephens and Stephens affiliates retain your personal data for the period of time required for the purposes for which it was collected or to comply with legal, regulatory and Stephens policy requirements.

We will regularly review the purposes for which we hold your personal information and will not hold it for longer than is necessary. We will also seek to minimise the personal information, which we hold about you wherever possible. If we intend to make use of your personal information for any new purposes which would be considered incompatible with the purposes for which it was originally collected, as set out in this Privacy Notice, we will notify you of such intended uses and if we need to, we will seek your consent to such activities, prior to the commencement of any such processing.

10. COOKIES, TRACKING TECHNOLOGIES AND IP ADDRESS

Whenever you use our websites, mobile sites, mobile applications or applications on any other devices, information may be collected through the use of cookies and similar technologies.

A. WHAT ARE 'COOKIES'?

Cookies are small text files which are downloaded to your computer or mobile device when you visit a website or application. Your web browser (such as Internet Explorer, Mozilla Firefox or Google Chrome) then sends these cookies back to the website or application on each subsequent visit so that they can recognize you and remember things like personalized details or user preferences.

Cookies are very useful for websites and do lots of different jobs that help to make your experience on a website as smooth as possible. For example, they let you move between web pages efficiently, remembering your preferences, and generally improving your experience. This helps provide you with a good experience when you browse the website and also informs site improvements, so that it keeps on meeting your needs.

They are referred to as **session** or **persistent** cookies, depending on how long they are used:

- Session cookies only last for your online session and disappear from your computer or device when you close your browser; and
- Persistent cookies stay on your computer or device after the browser has been closed and last for the period of time specified in the cookie. These persistent cookies are activated each time you visit the site where the cookie was generated.

Certain features of websites depend upon cookies to function and are deemed, within the law, to be strictly necessary (essential cookies). You will not be asked for your consent to place these cookies, however you may disable the cookies via your browser settings.

B. WHICH COOKIES AND TRACKERS DO WE USE AND WHY?

In this section we would like to tell you what Cookie we use and why.

Cookies allow web analytics services to recognize your browser or device and, for example, identify whether you have visited our Site before, what you have previously viewed or clicked on, and how you found us. The information is anonymous and only used for statistical purposes. It allows us to track information, such as how many individual users we have and how often they visit our websites. It also helps us to analyze patterns of user activity and to develop a better user experience.

The Cookies we use on our Site are "analytical" cookies. They allow us to keep the digital products and services, easy to use and up-to-date and we use web analytics services to help us understand how people use them. For example, we can see which parts of our products and services are most popular, identify when errors occur, and test different versions of a page or feature to see which one works best. These web analytics services may be designed and operated by other companies on our behalf. Web analytics data and cookies cannot be used to identify you as they **never** contain personal information such as your name or email address. [However, if you have registered and signed into our Services we may combine information from your registration with the data we get from the web analytics service and its cookies (or similar technologies) to analyze how you and other people use our digital products and services in detail and, where you have consented to receive such communications, to send you email and other communications that might be of interest to you. Where the combined information can be used to identify you, we use it only in accordance with our Terms and Conditions and Privacy Notice stephens.com

You can find more information about the individual cookies we use and the purposes for which we use them below:

Google Analytics

The analytics.js Javascript library is part of Universal Analytics and uses *first-party* cookies to:

- Distinguish unique users
- Throttle the request rate

Cookie Name	Purpose	Expires
ga	Used to distinguish users and sessions. The cookie is created when the javascript library executes and no existing __utma cookies exists. The cookie is updated every time data is sent to Google Analytics.	2 years from set/update
__gat	Used to throttle request rate.	10 minutes
DoubleClick	This cookie is used by Google in the ads served on the websites of its partners, such as websites displaying AdSense ads or participating in Google certified ad networks. This is part of Google Custom Search Functionality.	1 year

Our Own Cookies

We use some cookies to help in the general operation of our site. For example to help us to keep track as to whether you have accepted our Cookies policy:

Cookie Name	Purpose	Expires
EPIServer	Persistent and session cookie that provides caching and keeps you logged into the EPIServer CMS.	2 Hours
ASP.NET	Persistent and Session cookie that provides caching as well as keeping a user logged in to view reports for repeats visits.	For the duration of the browsing session

C. *HOW TO CONTROL YOUR SETTINGS*

There are various ways that you can control and manage your cookies which are discussed in a bit more detail below. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Please remember that any settings you change will not just affect Cookie used on this Site. These changes will apply to all websites that you visit (unless you choose to block cookies from particular sites).

Managing cookies in your browser

Most browsers will allow you to:

- See what cookies you've got and delete them on an individual basis.
- Block third party cookies.
- Block cookies from particular sites.
- Block all cookies from being set.
- Delete all cookies when you close your browser.

You should be aware that any preferences will be lost if you delete cookies (which also includes where you have opted out from cookies, as this requires an opt-out cookie to be set). Also, if you block cookies completely, many websites will not work properly and some functionality on these websites will not work at all. The links below take you to the 'Help' sections for each of the major browsers so that you can find out more about how to manage your cookies.

Internet Explorer

<http://support.microsoft.com/kb/> (opens in a new window)

Firefox

<http://support.mozilla.org/en-US/kb/Cookies> (opens in a new window)

Google Chrome

<http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647> (opens in a new window)

Opera

<http://www.opera.com/browser/tutorials/security/privacy/> (opens in a new window)

Safari

<https://www.apple.com/legal/privacy/em-ww/cookies> (opens in a new window)

Safari iOS

<https://support.apple.com/en-us/HT201265> (opens in a new window)

Android

<http://support.google.com/chrome/answer/2392971?hl=en-GB> (opens in a new window)

Windows Phone

<http://www.microsoft.com/windowsphone/en-us/howto/wp7/web/changing-privacy-and-other-browser-settings.aspx>
(opens in a new window)

IP addresses

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration and to report aggregate information to our developers and domain host. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

11. UPDATES TO THIS NOTICE

The information in this notice may change from time to time – for example, the categories of personal data that Stephens collects, the purposes for which it is used and the ways in which it is shared may change. This notice may be updated from time to time.

If we change this Privacy Notice in a way that may substantially alter the purposes for which we process your personal information we shall notify you by means of notice on our site homepage and where there is a material change to such terms, by email to the email address you have provided to us.

III. APPENDIX 1: Stephens CONTROLLER ENTITIES AND CONTACT DETAILS

Stephens ENTITY	BRANCH OF Stephens ENTITY (IF APPLICABLE)	CONTACT DETAILS
Stephens Europe Limited	London	Our registered London office is at 36-38 Cornhill, London, EC3V 3NG. Details of our notification to the UK data protection regulator may be found in the Information Commissioner’s Office Public Register of Data Controllers at www.ico.gov.uk under registration number ZA047950.
	Frankfurt	
Stephens Inc. – in respect of services provided to natural person clients, beneficial owners, partners or settlors habitually resident in the United Kingdom or the European Union		

IV. APPENDIX 2: PRINCIPALS

Each of the following is a 'Principal' for the purpose of this notice:

1. Natural person client or prospective natural person client of a Stephens entity;
2. Director, beneficial owner or shareholder of a company that is a client or prospective client of a Stephens entity;
3. Beneficial owner or fund unit holder of a fund to which a Stephens entity provides services or seeks to provide services;
4. Principal, protector, settlor, grantor, trustee, trust officer or current beneficiary of a trust to which Stephens provides services or seeks to provide services, or a person otherwise authorized to represent such trust;
5. General partner or partner with management responsibilities in a partnership that is a client or prospective client of a Stephens entity;
6. A person authorized by a client or prospective client of a Stephens entity to give instructions to a Stephens entity in respect of that client's account (including trading instructions and asset transfer instructions) or authorized to sign documents on behalf of such client;
7. Executor of an estate of a deceased natural person client of a Stephens entity;
8. Guardian of a natural person client of a Stephens entity, where such client is a minor;
9. Investment advisor to a client of a Stephens entity, where such advisor is a natural person (rather than a legal entity).