

PRIVACY NOTICE FOR DATA SUBJECTS IN THE EEA, SWITZERLAND AND UK

Effective Date: 10 August 2026

Your privacy is important to us. This privacy notice ("**Privacy Notice**") applies to every person from the EEA, Switzerland and the UK:

- who visits <https://mrianalytics.com/> (the "**Site**");
- who uses the services that we describe on the Site or who engages with us to use the services that MRI Analytics provides, as described on the Site (our "**Services**");
- whose personal data we may process in connection with providing the Services to others, including personal data that individuals share with MRI Analytics (including contractors/companies working on its behalf);
- where we have engaged you or the organisation you represent to provide us with products or services;
- who contacts MRI Analytics either in relation to the Site or the Services; or
- who applies to work at MRI Analytics, either as employees or contractors.

1. PURPOSES OF THIS NOTICE

This Privacy Notice explains to data subjects in the EEA, Switzerland and the UK the type of personal data that MRI Analytics LLC, MRI Analytics Services LLC and our branches/affiliates/parent companies ("**MRI Analytics**", "**we**", or "**us**") might collect from you, or which we have obtained about you from a third party, the purposes for which we process your personal data and your rights in respect of our processing of your personal data.

Please note that when using the Site it should be read in conjunction with our [Website Terms of Use](#).

Please also note that this Privacy Notice only applies to the use of your personal data obtained by us, it does not apply to your personal data collected during your communications with third parties.

2. WHO ARE WE AND WHAT DO WE DO?

We are the data controllers responsible for your personal data processed via the Site.

Please note that depending on which MRI Analytics entity you contract with in relation to the Services, or to which MRI Analytics entity you apply for a job, other MRI Analytics group companies or companies managed by MRI Analytics (the "**MRI Analytics Group**") may also be data controllers responsible for your personal data processed in relation to the Services.

3. PERSONAL DATA COLLECTION

Our primary goal in collecting personal data from you may be: (i) to help us deliver the Services; (ii) to develop new products or Services and conduct analysis to enhance current products and Services; (iii) to review the usage and operations of the Site; (iv) to provide you with customised Site content and Site experience; (v) to carry out requests made by you on the Site or in relation to Services (including via the contact form); (vi) to investigate or settle inquiries or disputes; (vii) to comply with any applicable law, court order, other judicial process, or the requirements of any

relevant regulator; (viii) to enforce our agreements with you; (ix) to protect our rights, property or safety or third parties, including our other clients and users of the Site or Services; (x) to provide support for the provision of Services; (xi) for recruitment purposes; and (xii) to use as otherwise required or permitted by law.

To undertake these goals we may process the following personal data:

- **Visitors to the Site.**
 - Contact information, including your name, job title, address, email address, telephone, or mobile number.
 - Your interaction with the Site.
 - Other information relevant to provision of Services.
 - Any other personal data you provide to us.
- **Potential recruits to any MRI Analytics office in the EEA, Switzerland or the UK.**
 - Name and job title.
 - Contact information including email address.
 - Curriculum vitae, your education, employment history and similar matters and similar information that you may provide to us.
 - Other information relevant to potential recruitment to MRI Analytics (including background checks, reference checks, immigration status, relevant test scores in relation to any application).
 - Information relating to criminal convictions and offences (as relevant and permissible).
 - Information relevant to diversity and inclusion monitoring and related initiatives. Such information may include special categories of personal data (such as information about your religious beliefs, sexual orientation, etc.) (as permissible).
 - Any other information you give to us as part of the application process or that you give to us generally.
 - Please note that MRI Analytics may also receive information from third party recruiters, agents and from your references as part of any recruitment process. Such information may also include special categories of personal data (such as information about your health, any medical conditions, your racial or ethnic origin, etc.).
 - We also collect information relating to potential recruits from third party recruitment agencies, third party professional networking sites (such as LinkedIn) and from individual potential recruits directly during MRI Analytics recruiting events.
- **Suppliers (including landlords, contractors, subcontractors and individuals associated with our suppliers and subcontractors).**

- We collect and process personal data about our suppliers (including trading counterparties) and their representatives in order to manage the relationship, contract, to receive services from our suppliers and, where relevant, to provide the Services to our clients.
- **Visitors to any MRI Analytics office in the EEA, Switzerland or the UK.**
 - If you attend one of our physical offices or other locations, we may process personal data that you volunteer in connection with your visit and any enquiries you make. For example, you may provide personal data when signing in as a guest. CCTV footage may also be collected for security purposes.

4. PERSONAL INFORMATION USE

We may use your personal data for the following purposes:

Fulfilment of Services.

We collect and maintain personal data that you voluntarily submit to us during your use of the Site and/or our Services to enable us to perform the Services.

- *These purposes include:*
 - general client management to ensure Services are provided correctly; and
 - relationship management between MRI Analytics and any client
- What is our legal basis?

It is necessary for us to use your personal data where it is in our legitimate interest or a third party's legitimate interest to use personal data in such a way to ensure that we provide the Services in the best way that we can.

Business management, administration and legal and regulatory compliance.

- We use your personal data for the following business management, administration and legal and regulatory compliance purposes:
 - to manage and administer MRI Analytics' business;
 - to comply with our applicable legal and regulatory obligations, including but not limited to Know Your Client, Anti-Money Laundering or Anti-Bribery or similar obligations);
 - to enforce our legal rights; and
 - in connection with a business transition such as a merger, acquisition by another company, or sale of all or a portion of our assets.
- What is our legal basis?

Where we use your personal data in connection with a business transition, to enforce our legal rights, or to protect the rights of third parties it is in our or a third party's legitimate

interest to do so. For all other purposes described in this section, it is our legal obligation to use your personal data to comply with any legal obligations imposed upon us.

Recruitment, Talent Management and Brand Awareness.

We use your personal data for the following recruitment, talent management and brand awareness purposes:

- to assess your suitability for any position for which you may apply at MRI Analytics;
 - to take any steps necessary to enter into any contract of employment (or otherwise) with you;
 - to comply with any regulatory or legal obligations in relation to any such application;
 - to maintain relationships and communicate with potential future; and
 - to maintain relationships with our alumni (with respect to Swiss employees only to the extent former employees separately agree upon termination of the employment relationship that MRI Analytics maintains respective personal data).
- What is our legal basis?

Where we use your personal data in connection with recruitment, talent management and brand awareness, it will be in connection with us taking steps at your request to enter a contract we may have with you or it is in our legitimate interest to use personal data in such a way to ensure that we can make the best recruitment, brand awareness and talent management decisions for MRI Analytics or it is our legal obligation to use your personal data to comply with any legal obligations imposed upon us. We will not process any special data except where we are able to do so under applicable legislation or with your explicit consent, or if relating to diversity and inclusion personal data, if such processing is in the substantial public interest (and permissible under local laws). Any personal data we process relating to criminal convictions and offences will be to comply with our legal obligation as a part of financial regulatory compliance and for the prevention of crime (financial or otherwise).

If we have engaged you or the organisation you represent to provide us with products or services

If we have engaged you or the organisation you represent to provide us with products or services (for example, if you or the organisation you represent provide us with services such as property leases or technical services), we will collect and process your personal data in order to manage our relationship with you or the organisation you represent, to receive products and services from you or the organisation you represent and, where relevant, to provide our Services to others.

- What is our legal basis?

It is necessary for us to use your personal data to perform our obligations in accordance with any contract that we may have with you or the organisation you represent, or it is in our legitimate interest to use personal data in such a way to ensure that we have an effective working relationship with you or the organisation you represent and are able to

receive the products and services that you or your organisation provides, and, where relevant, to provide our Services to others, in an effective way.

Physical and health security

We have security measures in place at our offices, including CCTV and building access controls. There are signs in our office showing that CCTV is in operation. The images captured are securely stored and only accessed on a need to know basis (e.g. to look into an incident). CCTV recordings are typically automatically overwritten after a short period of time unless an issue is identified that requires investigation (such as a theft). We require visitors to our offices to sign in at reception and keep a 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).

- What is our legal basis?

It is in our legitimate interests to process your personal data so that we can keep our premises secure and provide a safe environment for our personnel and visitors to our premises.

5. IF YOU FAIL TO PROVIDE YOUR PERSONAL DATA

Where we are required by law to collect your personal data, or we need to collect your personal data under the terms of a contract we have with you, and you fail to provide that personal data when we request it, we may not be able to perform the contract we have or are trying to enter into with you. This may apply where you do not provide the personal data we need in order to provide the Services you have requested from us or to process an application to register an account. In these circumstances, we may have to cancel your application or the provision of the relevant Services to you, in which case we will notify you.

6. HOW DO WE OBTAIN YOUR CONSENT?

Where our use of your personal data requires your consent, you can provide such consent:

- at the time we collect your personal data following any instructions provided; or
- by informing us by e-mail, post or phone using the contact details set out in this Privacy Notice.

7. PERSONAL INFORMATION SHARING

We will only share personal data with others when we are legally permitted to do so. When we share personal data with others, we use reasonable efforts to put contractual arrangements and security mechanisms in place to protect the personal data and to comply with our data protection, confidentiality and security standards.

Please note that when processing your personal data we may need to share it with other third parties as follows:

- Our affiliated/parent companies and licensees using the MRI Analytics or other MRI Analytics affiliate name, including subsidiaries of such companies.
- Third party service providers that provide applications/functionality, data processing or IT services to us. We use third parties to support us in providing our services and to help provide, run and manage our internal IT systems.

- Third party service providers that otherwise assist us in providing Services or information.
- Third party organisations that assist us with our marketing activities listed above, such as survey providers and similar.
- Third party organisations that assist with our recruitment activities listed above.
- Third-party service providers that are assisting us with the operation and administration of our events.
- Auditors, lawyers, accountants and other professional advisers.
- Law enforcement or other government and regulatory agencies or to other third parties as required by, and in accordance with, applicable law or regulation.

Occasionally, we may receive requests from third parties with authority to obtain disclosure of personal data, such as to check that we are complying with applicable law and regulation, to investigate an alleged crime, to establish, exercise or defend legal rights. We will only fulfil requests for personal data where we are permitted to do so in accordance with applicable law or regulation.

8. EXTRA-EEA, EXTRA-SWITZERLAND AND EXTRA-UK TRANSFERS

Please note that, due to the international operations of MRI Analytics, where necessary to deliver the Services (as set out in this Privacy Notice) we will transfer personal data to countries outside the EEA, Switzerland and the UK (including to MRI Analytics' US affiliates/parent company) and such personal data may be stored on servers located outside the EEA, Switzerland and the UK; in principle, in any country in the world. MRI Analytics – and many third-party service providers that MRI Analytics works with – are based in the US, but MRI Analytics also has material operations in the UK and the EEA. As such, your personal data will be transferred (both to other companies within the MRI Analytics Group as well as to third party service providers) to the US, the UK, and the EEA as required to deliver the Services. However, your personal data may also be shared with other companies within the MRI Analytics Group or third-party service providers outside of the EEA, Switzerland, and/or the UK, on a less frequent basis, where necessary to deliver the Services.

When transferring your personal data outside of the UK, the EEA, and/or Switzerland, we will use reasonable efforts to comply with applicable legal and regulatory obligations in relation to the personal data, including but without limitation having a lawful basis for transferring personal data where required and putting appropriate safeguards in place to ensure an adequate level of protection for the personal data. Unless we can rely on a derogation under Art. 49 GDPR or equivalent provision under applicable law (e.g., if the transfer is necessary for the performance of a contract, in the case of legal proceedings abroad, or if you have consented to the transfer in question), we will, where required by applicable law, implement at least one of the safeguards set out below. Please contact us if you would like further information on the specific mechanisms used by us when transferring your personal data outside the UK, the EEA, and/or Switzerland.

Adequacy Decisions

We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data, or have a system of certification pursuant to which transfers of personal data to participating organisations are deemed adequate, by the European Commission, the Swiss Federal Council, and/or the UK Government (as applicable). Such

systems of certification may include the EU-US Data Privacy Framework adopted pursuant to European Commission Implementing Decision of 10 July 2023, the UK Extension to the EU-US Data Privacy Framework adopted pursuant to The Data Protection (Adequacy) (United States of America) Regulations 2023, and any analogous frameworks or certification schemes adopted by the applicable governmental or regulatory body under applicable law.

Model Clauses

Where we transfer your personal data to certain service providers or entities within the MRI Analytics Group, we may use specific standard contractual clauses approved by the European Commission (as adapted to also satisfy Swiss law requirements) and/or the UK Government which give personal data the same protection it has in Europe, Switzerland, and/or the UK (as applicable).

9. HOW LONG DO WE KEEP YOUR PERSONAL DATA FOR?

Regarding visitors to the Site, we will retain relevant personal data for at least six years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation, the Swiss Federal Data Protection Act, the UK GDPR and the UK Data Protection Act 2018, or similar legislation around the world (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations).

Regarding personal data we have processed as part of providing you with the Services, we will retain relevant personal data for at least six years from the date of our last interaction with you and in compliance with our obligations under the EU General Data Protection Regulation, the Swiss Federal Data Protection Act, the UK GDPR and the UK Data Protection Act 2018, or similar legislation around the world (or for longer as we are required to do so according to our regulatory obligations or professional indemnity obligations). We may then destroy such files without further notice or liability. If you request your files and documents we may charge you for the costs of copying a duplicate.

Regarding personal data we have processed in relation to any recruitment activity, if you are unsuccessful in your application your personal data will be kept for a period after informing you that you were unsuccessful. If you are successful any retention protocols that apply to staff members at MRI Analytics will apply. In considering how long to keep your personal data, its relevance to MRI Analytics' business and your potential employment either as a record or in the event of a legal claim will be taken into account.

If personal data is only useful for a short period, e.g. for specific marketing campaigns or CCTV footage, we may delete it after such retention period.

10. PERSONAL DATA SECURITY

We take the security of all the personal data we hold very seriously. We use reasonable efforts to adhere to internationally recognised security standards. We have a framework of policies, procedures and training in place covering data protection, confidentiality and security and regularly review the appropriateness of the measures we have in place to keep the personal data we hold secure.

11. YOUR RIGHTS AND ACCESS TO PERSONAL DATA

You have the following rights in relation to the personal data we hold about you:

- **Right of access.**

If you ask us, we will confirm whether we are processing your personal data and, if necessary, provide you with a copy of that personal data (along with certain other details). If you require additional copies, we may need to charge a reasonable fee.

- **Right to rectification.**

If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If you are entitled to rectification and if we have shared your personal data with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.

- **Right to erasure.**

You can ask us to delete or remove your personal data in some circumstances such as where we no longer need it or if you withdraw your consent (where applicable). If you are entitled to erasure and if we have shared your personal data with others, we will let them know about the erasure where possible. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.

- **Right to restrict processing.**

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances such as where you contest the accuracy of that personal data or you object to us. If you are entitled to restriction and if we have shared your personal data with others, we will let them know about the restriction where it is possible for us to do so. If you ask us, where it is possible and lawful for us to do so, we will also tell you who we have shared your personal data with so that you can contact them directly.

- **Right to data portability.**

You have the right, in certain circumstances, to obtain personal data you have provided us with (in a structured, commonly used and machine readable format) and to reuse it elsewhere or to ask us to transfer this to a third party of your choice.

- **Right to object.**

You can ask us to stop processing your personal data, and we will do so, if we are:

- *relying on our own or someone else's legitimate interests to process your personal data, except if we can demonstrate compelling legal grounds for the processing; or*
- *processing your personal data for direct marketing.*
- **Rights in relation to automated decision-making and profiling.**

You have the right not to be subject to a decision when it is based on automatic processing, including profiling, if it produces a legal effect or similarly significantly affects you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us.

- **Right to withdraw consent.**

If we rely on your consent (or explicit consent) as our legal basis for processing your personal data, you have the right to withdraw that consent at any time.

- **Right to provide instructions on the handling of your personal data after your death (France only).**

You have the right to define guidelines as regards the retention, erasure and communication of your personal data after your death. Such guidelines may be general or specific, as set out in the French Data Protection Act.

- **Right to lodge a complaint with the supervisory authority.**

If you have a concern about any aspect of our privacy practices, including the way we have handled your personal data, you can report it to your local data protection regulators – for instance but without limitation those regulators in the EU, Switzerland and the UK in which MRI Analytics has offices are as follows:

In the Netherlands, the data protection regulator is the Autoriteit Persoonsgegevens (AP). You can contact the AP using the following website <https://www.autoriteitpersoonsgegevens.nl/en>.

12. COLLECTION OF INFORMATION BY THIRD-PARTY SITES AND SPONSORS

The Site contains links to other sites whose information practices may be different than ours. Visitors should consult the other sites' privacy notices as MRI Analytics is not responsible for, and has no control over, information that is submitted to, or collected by, these third parties.

13. REVISIONS TO THIS PRIVACY NOTICE

We may make changes to this Privacy Notice from time to time.

To ensure that you are always aware of how we use your personal data we will update this Privacy Notice from time to time to reflect any changes to our use of your personal information. We may also make changes as required to comply with changes in applicable law or regulatory requirements. We encourage you to review this Privacy Notice periodically to be informed of how we use your personal data.

14. CONTACT US

If you have any questions about this Privacy Notice or want to exercise your rights set out in this Privacy Notice, please contact us by:

- sending an e-mail to information@mrianalytics.com; or
- sending a written request to:

MRI Analytics LLC

- 500 W Jefferson, Louisville KY 40202, USA

MRI Analytics Services LLC

- 500 W Jefferson, Louisville KY 40202, USA