

Filtronic plc (“the Company”) collects and processes (via its Registrars, currently, Link Market Services Limited (herein “Link”)) personal data relating to shareholders and other Data Subjects (as defined in Schedule 1 to this notice) to manage the shareholder relationship in compliance with the Companies Act 2006, as amended from time to time, its regulatory obligations as a company whose shares are traded on the AIM market of the London Stock Exchange.

The Company is committed to being transparent about how it collects data, uses that data and meets its data protection obligations.

#### What information does the Company collect?

The Company, primarily via its Registrars, collects and processes the following categories of personal data:

Full name, email address, registered address, telephone number, full date of birth, nationality, bank account details, national insurance number, passport number and overseas identification card numbers, shareholdings, communication method preference, and any data that is mirrored from the CREST system. Where this is provided to Link, copies of documents such as death certificates and grants of probate.

**In relation to the Link online portal:** mother’s maiden name, user names combined with passwords, cookies and online identifiers, security questions plus answers.

**In relation to due diligence and anti-money laundering checks:** scanned or photocopied images of passports, driving licences and utility bills.

Regulatory requirements: In addition to some of the above categories, details of the countries where tax resident.

All of the above is called the Shareholder Personal Data (“SPD”).

#### Why does the Company process personal data?

The Company needs to process/have processed the Shareholder Personal Data to comply with its legal obligations for example, under the provisions of the Companies Act 2006, as amended from time to time, its regulatory obligations as a company whose shares are traded on the AIM market of the London Stock Exchange and other legislation and regulations for example money laundering legislation and the UK Takeover Code and where it is in the Company’s legitimate business interests.

The SPD is processed by our Registrars as a necessary part of shareholder registration services, including:

- i. Registrar Management of the shares of the Company;
- ii. Registration of share transactions;
- iii. Processing of administrative changes to shareholder records;
- iv. Payment of dividends and interest payments;
- v. Provision by Link of internet-based services;
- vi. Provision of telephone-based services to shareholders;
- vii. Provision of postal based services to shareholder
- viii. Share dealing services;
- ix. Dealing with Queries and complaints;
- x. Annual General Meeting Services (“AGM”);
- xi. Management Reporting and data feeds;
- xii. Investor relations services;
- xiii. Miscellaneous processing actions;
- xiv. Provision by the Registrars of on-line services to the Company and shareholders;
- xv. Share Portal or Branded Activity.

Further details about this processing activity is set out in Schedule 2.

### Who has access to data?

In accordance with the Companies Act 2006, including in particular section 793 and related sections of that Act, anyone has the right to request and receive a record of all shareholders of the Company including a list of all sub-custodian level investors or beneficial shareholders in accordance with applicable laws. In some cases, these records must be available for public inspections. Additionally, shareholder personal data may be shared internally with members of the Board of the Company, its nominated adviser, legal advisers, auditors, its registrars.

### How does the Company protect data?

The Company takes the security of your data seriously. The Company has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed other than for the purposes described above.

Additionally, as our Registrars are the principal processors of Shareholder Personal Data, the Company will be entering into a specific addendum to our share registration services agreement with Link covering its processing activities and its security arrangements (including its technical and organisational measures).

Where the Company engages third parties to process personal data on its behalf, they do so on the basis of written instructions, and are under a duty of confidentiality. They are obliged to implement appropriate technical and organisational measures to ensure the security of this data.

### For how long does the Company keep data?

The periods for which your data is held after the end of shareholder are [12 years]

### Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Company to change incorrect or incomplete data;
- require the Company to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Company is relying on its legitimate interests as the legal ground for processing; and
- ask the Company to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Company's legitimate grounds for processing data.

If you would like to exercise any of these rights, please e-mail: [datasubjectaccessrequests@filtronic.com](mailto:datasubjectaccessrequests@filtronic.com)

If you believe that the Company has not complied with your data protection rights, you can complain to the Information Commissioner.



## Schedule 1

### Definition of Data Subjects

The Company Personal Data transferred concern the following categories of Data Subjects:

- a) Registered shareholders of the Company;
- b) Executors, administrators and legal representatives of a deceased shareholder or in relation to a bankruptcy order;
- c) Transferees where there is a change of ownership;
- d) Indirect shareholders of the Company (for example through a registered nominee or custodial shareholding), and including indirect shareholders with information rights;
- e) Indirect or beneficial shareholders of the Company where their details are obtained by Link under section 793 of the UK Companies Act 2006 (or equivalent legislation);
- f) Any person or entity requesting copies of information and document circulated by the Company to its shareholders;
- g) Employees, directors or contractors of the Company, where such information is provided to Link by the Company.

## Schedule 2

### Further Details of the Purpose of the Processing

#### 1. Registrar Management – shares of the Company

- Maintenance and storage of shareholder records (which contain personal details and instructions from shareholders) in electronic and paper format in compliance with Applicable Laws and regulatory requirements:
  - Maintain an on-line transaction history including closed accounts and gone-aways
  - Store the Company's historical shareholder records in paper, microfiche or electronic format as appropriate
  - Provide the Company with access to archived material on request
- Flag accounts as 'gone-away' if mail returned unopened on previous occasions; prevent further mailings, as far as practicable, to that address
- Record account designations
- Maintain alternative correspondence addresses (not forming part of the register)
- Process and record markers denoting electronic communication preferences of shareholders
- Maintain access to an online enquiry facility to allow public inspection of the share register at Link's premises in accordance with the regulatory requirements; process all requests for access to the Register
- Allow public inspection of the register in accordance with Applicable Laws and regulatory requirements; process all requests for access to the register; provide copies of the register in accordance with the Applicable Laws and regulatory requirements
- Provide the Company with copies of the register on request
- Using an Affiliate where required, provide information about Link's nominee service to shareholders, and assess any applications from shareholders and participants to join this service
- Using an Affiliate where required, provide information about any 'shareholder reduction programmes' to shareholders, and assess any applications from shareholders in relation to such programmes
- Liaise with third party printers and mailing houses and provide them with Company Personal Data in order to facilitate printing and mailing in relation to the Services
- Analyse the Services provided by Link and means of improving this
- Where required, provide notifications to shareholders about changes to the Services
- Participate in planning meetings with the Company and its advisers for corporate events including annual general meetings and corporate actions
- Record, process and communicate with beneficial/indirect shareholders of the Company, particularly with beneficial/indirect shareholders with certain rights to information, and where required, circulation of Company issued documents to such Data Subjects
- Ongoing due diligence on the Company and its directors and significant shareholders as part of Link's regulatory obligations
- Process data for CRS and FATCA reporting purposes where agreed with the Company

## 2. Registration of Share transactions

- Transfer shares following instructions from shareholders
- Daily record of settled transactions with CREST; other reconciliations as required
- Process off market transactions including gifts
- Where transactions involve a change to share capital, update the share capital figure accordingly
- Allot new shares or shares out of treasury accounts
- Issue share certificates (if applicable)
- Create all relevant documentation including transfer letters in a format agreed with the Company
- Update share capital figure following share allotments, share cancellations or treasury movements
- Facilitate transfer of repurchased shares
- Facilitate transfer of shares out of treasury accounts for purposes other than share plans

## 3. Processing of administrative changes to shareholder records

- Process basic changes to shareholder records at shareholder's (or appointed representative's) request, including but not limited to:
  - Change of name
  - Change of mailing address
  - Set up, amend or cancel bank mandates
  - Change dividend election (cash, scrip or Link's dividend reinvestment plan (DRIP) service)
  - Elect for electronic or paper documents
  - Elect for full or summary annual reports
- Operate industry standard fraud prevention measures, for example, to verify changes to address / bank account
- Consolidate accounts and certificates on request of verified shareholder
- Cancellation and re-issue of lost dividend cheques, tax vouchers and dividend confirmations as required by verified shareholder or their appointed representative
- Re-issue lost certificates to verified shareholder including appropriate indemnity processes
- Process and record the death of a shareholder, probate instructions including letters of request, letters of administration and small estates procedures
- Process and record bankruptcy orders
- Process and record forms of rectification
- Process and record court orders
- Process and record powers of attorney
- Process and record letters and orders of third party authorities over an account
- Process and record any other legal documentation or orders received including change of name deeds and protection orders

#### 4. Payment of dividends and interest payments

- Agree an annual timetable with the Company to set dividend/interest record, ex-dividend, relevant scrip (if applicable) and payment dates in accordance with LSE requirements, and dates for the provision of funding letters, stationery proofs and calculations etc.
- Calculate dividend and/or interest requirements where requested
- Process and payment of dividend and/or interest monies including the communication of dividend confirmations
- Maintain records of cash residue amounts, and pay sums to leavers or to charity on request. Capture register data at the record date
- Confirm dividend waiver on various accounts
- Calculate total cash and share elections and forward data to the Company
- Provide relevant documentation in relation to dividends and/or interest, including funding letters together with a checked dividend and/or interest calculation
- Calculate individual share entitlements for scrip participants including residue from prior payments (if applicable)
- Calculate individual dividend and/or interest payments
- Transfer participant monies and shares electronically at the time of a dividend and/or interest event to enable required purchases and individual allocations to be completed for the DRIP
- Create and communicate DRIP share purchase advice notes and accompanying certificates where required
- Creation and communication of DRIP cash statements
- Open, operate and reconcile bank accounts
- Maintain automated link with the nominated banks to ensure the capture of information relating to presented warrants
- Full reconciliation service, those dividends and/or interest presented and un-presented and affirmation to balances with equal value of net dividend and/or interest warrants issued
- Cancellation and reissue of replacement cheques on request
- Maintaining records of unclaimed dividend and/or interest payments
- Prepare checked proofs of dividend and/or interest stationery
- Processing dividend and/or interest cheques with accompanying dividend and/or interest confirmation
- Managing the printing, personalisation and mailing of cheques, dividend and/or interest confirmation, scrip statements and share certificates to arrive on dividend and/or interest payment date
- Credit bank accounts of shareholders receiving mandated dividends and/or interest on payment date
- Credit shareholder accounts with scrip or DRIP shares and update the share register on the relevant payment date
- Provide a scheme to pay dividends and/or interest in other currencies on verified shareholder request (i.e. Link's International Payment Service)
- Provide information about Link's International Payment Service to shareholders
- Advise shareholders regarding unclaimed dividends and/or interest
- Release of unclaimed dividend and/or interest payments as appropriate
- Record ongoing payment details including any currency elections if applicable

#### SCRIP dividend process (if applicable)

- Process and provide SCRIP statements to holders in CREST
- Process and provide SCRIP statements to holders whose dividend does not cover allotment of one share
- Process and provide SCRIP statements and certificates to non-CREST shareholders
- Electronic letter and dividend confirmation for mandated dividends

#### DRIP process (if applicable)

- By means of the services of an Affiliate of Link, if required, to provide information (including marketing information) regarding the DRIP to shareholders of the Company
- By means of the services of an Affiliate of Link, if required, assess any applications from shareholders and participants to participate in the DRIP, process joiners and leavers to the DRIP

#### 5. Provision of internet-based services to shareholders

- Provide a secure web-based service to shareholders and to the Company (see PART B – Online Services)

#### 6. Provision of telephone-based services to shareholders

- Provide a contact centre for telephone enquiries (operator service 9:00am – 5.30pm (or as agreed) weekdays UK time excluding bank holidays)
- Verify and record calls
- Change name, address and dividend mandate details (with confirmation by post if applicable)
- Opt in or out of electronic delivery of company materials

#### 7. Provision of postal-based services to shareholder

- All post received to be scanned and logged and available to view electronically tagged to the relevant shareholder account
- If applicable provide file of new shareholder details to the Company's nominated print provider and/or the Company each month for the mailing of welcome materials (if applicable)
- Process returned welcome letter forms (if applicable)
- Print, personalise and mail share certificates for consolidations, replacements and splits
- Provide historical shareholding statements to assist with shareholders' capital gains tax computations including statements for employees detailing holdings released and options exercised under share plans
- Record postal queries and requests for reporting purposes
- Securely maintain adequate stocks of the Company's share certificates (if required)
- Maintain records of certificate numbers used and damaged certificates
- Maintain appropriate stocks of envelopes for various mailings (if required)

#### 8. Share dealing services

- Provide services for UK domiciled shareholders to buy or sell shares via internet, telephone or post (subject to separate terms and conditions entered into with such shareholders)
- Provide, where possible, services for overseas shareholders to buy or sell shares in the Company via internet, telephone or post at low cost (subject to separate terms and conditions entered into with such shareholders)

#### 9. Queries and complaints

- Record and monitor all queries, complaints and requests received by email, telephone and post
- Research and respond to direct shareholder queries, complaints and requests
- Assist the Company with shareholder queries by either providing requested information or responding on behalf of the Company
- Report escalated complaints to the Company

#### 10. Annual General Meeting ('AGM') services

- Participate in planning meetings and liaise with the Company's nominated representative prior to the

- meeting
- Capture shareholder data for personalisation of proxy cards; for main mailing and top-up mailings as required
- Send emails to shareholders registered for e-delivery with links to the Company's website, in the Company's specified format (where applicable)
- Liaise with the relevant printer and mail firms regarding bulk mailing of annual report and accounts and related documents
- Provide Company Personal Data to the printer and mailing house to facilitate printing and mailing in relation to the processes above
- Provide a return address for undeliverable documents and process undelivered documents
- Investigate any documents which are returned undelivered and annotated, and re-address where possible
- Provide proxy solicitation services and process proxy appointments
- Capture shareholder data for attendance rights e.g. third party proxies
- Evaluate and process proxy votes received
- Where agreed with the Company, provide daily reports on proxy voting
- At the AGM, handle shareholder registration, enquiries, poll count and other relevant activities
- Register AGM attendees, including guest and other non-shareholders, at the meeting
- Advise the Company of number of attendees and votes at the meeting and how these have been cast
- Complete the poll count by paper poll cards or electronic handsets as required
- Where agreed with the Company, provide final reports on voting and attendance at shareholder meetings

#### 11. Management Reporting and data feeds

- Provide reports on fraud activity or complaint activity based on thresholds provided by the Company
- Provide a secure facility for delivering non-register generated reports e.g. bank reconciliations, shareholder interaction records
- Provide any other statutory or regulatory reports and other reports on the register as requested

#### 12. Investor relations services (if applicable)

- Analysis, processing and storage of the register in order to provide investor relations services, including reports and an online platform that cover shareholder analysis, investor targeting information, sector and market intelligence across registered shareholders, institutional investors, underlying beneficial owners and employee shareholders
- Carry out processes required under section 793 and related sections of the Companies Act 2006 (or equivalent legislation) including requests to custodians on behalf of the Company, receive and record a list of all sub-custodian level investors or beneficial shareholders in accordance with applicable laws; store such records and make these available for public inspection as required by applicable laws; use such records as a basis for detailed analysis as agreed with the Company, the results of which will be communicated to the Company

#### 13. Miscellaneous processing actions

- Any other processing activity which is strictly necessary for the processing of personal data in order to provide the Service and in accordance with the purpose of the processing identified in the table above
- Any other processing activity which the Company instructs Link to carry out
- Liaising with, engage and share Company Personal Data with third party service providers to help Link provide the Services. Such third party service providers may include, for example, cloud storage providers (engaged by Link to provide electronic storage facilities for data and information in relation to the Service), printer and mail firms (engaged by Link or by the Company) and providers of data protection risk



management platforms and reporting tools (engaged by Link to record and monitor data protection governance, risk and compliance in accordance with best practice risk management procedures)

## PART B: Online Services

### Provision of Registrar Online Services to the Company and shareholders

#### (A) Corporate Portal

- Provide remote online access to designated members of the Company's staff to view the share register and carry out functions which may include:
  - Search for individual accounts by name, shareholder reference or address
  - View and download individual account details, balances and transaction history
  - View and download account indicators eg. e-delivery, DRIP, gone-away
  - View and download share capital totals and transaction history
- Restore log-in and account details for users
- Facilitate certain processing actions specified in this Schedule
- Repairs and maintenance work to the portal
- Secure file transfer facility
- Provision of reports

#### (B) Registrar's Share Portal or Branded Portal

- Provide online web portal which can enable shareholders to access and manage their shareholdings in the Company online and carry out functions which may include:
  - View account details, balance and transaction history
  - Change address, email address and dividend mandate details
  - Opt in or out of electronic delivery of company materials
  - Opt in or out of receiving full Annual Report and Accounts
  - Opt in or out of participation in DRIP
  - Electronic proxy appointment for AGMs and EGMs
  - Provide a secure email facility for enquiries
  - Where shareholders have contacted the Company by email, respond on behalf of the Company, via email/telephone/post as appropriate
  - Review relevant content on the Company's website and the Company's email broadcasts relating to registrar services and processes on request as appropriate
- Receive and provide information to shareholders, including in relation to products and services available to them
- Restore log-in and account details for shareholders
- Facilitate certain processing actions specified in this Schedule
- Repairs and maintenance work to the portal.

