



## MARSHBERRY - GLOBAL CONSUMER PRIVACY NOTICE

Last modified on May 8, 2026

MarshBerry is committed to protecting your personal data. This Privacy Notice explains how we process and protect your personal data and respect any rights you benefit from under your local law.

### 1. PURPOSE OF THIS PRIVACY NOTICE

This Privacy Notice aims to give you information on how MarshBerry collects and processes your personal data, including any data you may provide through this website for example when you sign up to our newsletter, or through one of our virtual data rooms, or if you otherwise get in touch such as by phone or email.

It is important that you read this Privacy Notice together with any other statements or fair processing notices we may provide on specific occasions when we collect or process personal data so that you are fully aware of how and why we are using your data. This Privacy Notice supplements those other notices and is not intended to override them.

### 2. ABOUT US

In this Privacy Notice "MarshBerry", "we", "us" and "our" refers to all the offices of Marsh, Berry & Co., LLC, as well as all affiliate entities of Marsh, Berry & Co., LLC with access to, or that participate in processing, your personal data under this Privacy Notice.

Contact details of our offices around the world can be found here:

<https://www.marshberry.com/about/locations/>.

The data controller(s) in respect of your personal data will be the MarshBerry entity or entities with which you are dealing. Please see <https://www.marshberry.com/about/locations/> for our various entity locations. Marsh, Berry & Company, LLC is responsible for processing your personal data during your visits to the US sections of our website, and IMAS Corporate Finance LLP, MarshBerry UK Holding Limited and MarshBerry International Coöperatief U.A. are responsible for processing your personal data during your visits to the Europe sections of our website.

### 3. THIRD PARTY LINKS

This website may include links to third-party websites, plug-ins, and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy policies. You should read any policies and other statements on such websites carefully.

### 4. THE DATA WE PROCESS ABOUT YOU

Personal data means any information about an individual from which that person can be identified. It does not include data which has been anonymized such that a person's identity is removed.

We may collect, use, store and transfer different kinds of personal data. The categories of personal data which we process include:

- **Contact Data**, such as names, job titles and other identifiers together with addresses, email addresses and telephone numbers.
- **Client Data**, including personal data in connection with and as a result of, providing our services (aside from Contact Data). This personal data varies according to the matter in question and in particular, depends on whether you represent a business or are an individual client. For example, we typically hold data about key contacts and other employees within our business clients, including information about their involvement in a matter or transaction. Where we act for individuals, we may hold bank account details, salary details, and employment history including performance and disciplinary matters. In some cases, client data may also include sensitive or special category data, for example if your identity documents which you provide us copies of, show your ethnic origin. We may also collect video and audio recordings of phone calls and related metadata (such as duration and phone numbers).
- **Third-Party Data**, including data about people other than clients in connection with our services (e.g. Data Room Providers). This usually includes Contact Data about other professionals and counterparties to a transaction. It might also include data about trustees and beneficiaries such as their names and addresses. It may also include data about third party sources of funds and those with a beneficial interest in a particular legal entity. We may also collect video and audio recordings of phone calls and related metadata (such as duration and phone numbers). Where we are providing Intellectual Capital services, we may collect information relating to our clients' staff members and/or insurance policyholders for benchmarking purposes. Aside from Contact Data, this may include client staff members' gender, birth date, branch and state, employment dates, job title/roles, experience levels, salary/bonus/commission information, profit centers, hours per week and percentage of time allocated to each role, and annual new business goals. With respect to insurance policyholders, this may include: customer ID numbers, addresses, client product codes, insurance policy numbers and premiums, bill types, service rep identifiers, agency commissions, and any additional information provided by our client. With respect to members of FirstChoice, we may receive applications for insurance policies including Contact Details plus date of birth, social security number, value of home/car/assets, and insurance policies an individual is interested in, and insurance policies containing personal data such as date of birth, drivers scheduled on the policy, driver's license numbers, as well as agency information tied either to employee ID number or social security number.
- **Technical Data**, including internet protocol (IP) addresses, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access our website and other platform(s). This may also include information about how you use our website, our other platform(s) and our services.
- **Marketing Data**, including marketing and communication preferences and data used for networking and business development such as employment history, role and information about personal interests.
- **Visitor Data**, including Contact Data, job title, company, date/time of visit; images, video and audio recordings of visitors to our premises; license plate information with respect to visitors accessing our parking garage.
- **Accessibility Data**, including accessibility and dietary requirements, which may be required if you attend our premises or events we host. This may include special or sensitive category data regarding your health (including disability) and/or religious beliefs.

## 5. FAIR AND LAWFUL PROCESSING

In some cases, where required by local law, we may ask you for explicit consent for processing your personal data for a specific purpose.

We only collect, use, disclose or otherwise process your personal data where it is fair and lawful to do so.

Where we need to collect personal data by your local law or according to a contract, under the terms of a contract we have with you or the organization you represent or for another lawful reason and you fail to provide that data, we may not be able to fully perform our obligations in accordance with our contract, provide you with the information you require, or even provide our services to you at all.

## **6. HOW YOUR PERSONAL DATA IS COLLECTED**

Most of the personal data which we hold is collected directly, whether through an online data room, by email, over the phone or through face-to-face interactions, and will be directly from you or in some cases might be provided by your colleagues. Some Client Data will be collected by our clients and subsequently provided to us. You may also provide information through our website, for example by signing up to our newsletter, or if you contact us to provide us with feedback.

Personal data collected by FirstChoice is provided to us by FirstChoice member agencies. Personal data collected by our Intellectual Capital team is provided to us by our clients.

Some of the technical data which we collect may be collected automatically (e.g. Technical Data) as you interact with our website for example via the use of cookies and similar technologies.

## **7. PURPOSES FOR WHICH WE USE YOUR PERSONAL DATA**

The information below explains the purposes for which we use different categories of personal data. Your local law may require us to set out in this Privacy Notice the legal basis on which we rely in order to process your personal data. In such case the information below also explains the legal basis or bases which we believe applies to those uses. We may process your personal data for more than one lawful basis depending on the specific purpose for which we are using your data.

### Operating the MarshBerry website

We process Contact Data and Technical Data to operate our website. This includes collecting data to deal with its functions such as handling requests to sign-up to our newsletter. This data also helps us to administer our website including troubleshooting, data analysis, testing, system maintenance and support. The legal basis or bases are indicated below per headline separately.

### Use of cookies and similar technologies for collection of general data and information

We use cookies and similar technologies to record a variety of general data and information each time you or an automated system accesses the website. The following types of general data may be recorded on our server log files: the browser type and version used, the operating system used by the accessing system, the website from which an accessing system accesses our website (called a referrer), the sub-pages accessed on our website by an accessing system, the date and time at which the website was accessed, an internet protocol address (IP address), the internet service provider of the accessing system, and other similar data and information that serves to protect against hazards in case of attacks against our IT systems.

This information is used to correctly supply the content of our website, optimize the content of our website and advertisements on the site, ensure the long-term functionality of our IT systems and website technology, and provide criminal prosecutors the information they need for criminal proceedings in case of a cyber-attack. This data and information is recorded pseudonymously by MarshBerry for statistical



purposes, and is analyzed with the goal of improving data privacy and data security in our company, in order to ultimately ensure an optimal level of protection for the personal information we process.

Cookies and similar technologies are also used to optimize the information and services available on our website to benefit users. They allow us to recognize returning website visitors. The purpose of this recognition is to make it easier for users to utilize our website. Users of a website that stores cookies, for example, do not need to input their access details each time they visit the site, since the website and the cookie saved on the user's computer system handles this function.

For more information on our use of cookies and other similar technologies, please review our website.

The use of data for this purpose and the legal basis for processing it is our legitimate interests in managing and improving our website and its content which is an important tool for the development and operation of our business, and for network security. Where the use of cookies requires your consent under local laws, we obtain consent for the use of such cookies from you.

#### Contacting us via our website

MarshBerry website includes information that allows you to quickly contact our company via electronic means and to communicate directly with us. You may contact us through the email address provided. If you contact MarshBerry via email, the personal data transmitted by you is automatically saved. Such personal data provided voluntarily by you to MarshBerry is saved for the purposes of processing your communication or contacting you. Our legal basis for processing this personal data is our legitimate interest in handling your request and improving our services. In case your request is aimed at entering into a contract with us or relates to an existing contractual relationship, the legal basis is also pre-contractual or contractual necessity.

#### Providing our services

We use Contact Data, Client Data, Third-Party Data, and sometimes Technical Data for the purpose of (and on the legal basis of our legitimate interests in) providing our services, and related tasks such as invoicing and payment, handling enquiries and administering our complaints procedure. This purpose may also involve us disclosing personal data to for example, other professionals involved in the matter such as solicitors, finance providers, accountants, and the advisors of counterparties. Occasionally, Contact Data and Client Data may also need to be disclosed to insurers.

Where we are acting for you personally, we use data in this way on the legal basis that you have consented to processing and/or it is necessary for fulfilling our client agreement with you for the provision of the services. In addition, and also where we are acting for your organization, we use this data on the legal basis that it is necessary for our legitimate interests in providing our core function. Under local laws, we are obliged to retain some of the information used for providing our services and are using such information to comply with our legal obligation.

#### Managing our relationship with you

We use Contact Data, Client Data, Third-Party Data, and sometimes Technical Data for the purpose of managing our relationship with you and our internal operations, such as asking you to provide feedback. We may also need to use this to respond to new enquiries which we may receive.

We do this on the legal basis that it is necessary for our legitimate interests in improving efficiency, training and monitoring of staff, quality control, and statistical analysis of our business performance.

### Regulatory compliance

Under your local law, MarshBerry may be regulated by public authorities and is required to comply with the rules specified by that body as well as rules relating to the avoidance of money laundering and other financial crime. Where required under your local law, we use Contact Data, some Third-Party Data and Client Data, to comply with those rules such as date of birth, passport and driving license details. Some of this is obtained from third party sources including information which is a matter of public record. We may also need to disclose information to our auditors which from time to time may include Client Data.

Our legal basis for processing is that it is necessary to ensure that we comply with the legal obligations which we are subject to in particular those we adhere to as a regulated body including regulations in relation to the proceeds of crime and money laundering avoidance. In case we use data which is not necessary to comply but which fosters compliance, our legal basis is also our legitimate interests in using data to foster compliance.

### Managing non-client relationships

We use Third Party Data about suppliers, intermediaries and other professionals including investors, finance providers, solicitors, accountants, and legal and other professional advisors of counterparties. This usually includes Contact Data in relation to those persons.

Our legal basis for this processing is that it is necessary for our legitimate interest in retaining services directly with such third parties, or otherwise because it is for the benefit of our clients in connection with a matter, facilitating a proper working relationship with third party professionals and business development purposes.

### Marketing and business development

We may send to you marketing communications such as information about our services, upcoming events and updates including by way of our newsletter. This use includes Contact Data and Marketing Data whether relating to our clients, professional advisors or other contacts. It may also include some Technical Data where we track user activity and engagement with marketing messages (see section -> 11. Newsletter Tracking).

We usually send our newsletter and other marketing communication based on appropriate consents to do so (see section -> 10. Your Choices Regarding Direct Marketing) in accordance with the rules relating to marketing communications (where such consent is required under your local law). We provide further information about this when data is collected such as on our online newsletter sign-up form. The type and content of marketing messages subscribers receive, and if it may contain third party content, is clearly outlined at the point of subscription.

Otherwise, our legal basis for processing Marketing Data (and Contact Data for marketing purposes) is that it is necessary to fulfil our legitimate interests in developing our business, providing information about us or our business activities, winning new work and increasing our profile.

### Visitors to our premises or off-site events

We collect Visitor Data in order to arrange and facilitate in-person events and meetings, and otherwise with respect of individuals attending our premises and using our parking garage.

We may also collect Visitor Data for internal communications or brand promotion, promoting the business and maintaining corporate records.

Our legal bases for processing this data are our legitimate interests in arranging and facilitating in-person events and meetings, ensuring the security of our office premises and ascertaining, exercising or defending rights in judicial or administrative proceedings, and to allow visitors to use our parking garage. With respect to CCTV data, we also process this on the basis of our legal obligation to provide a safe working environment for our employees under employment and health and safety legislation. Where we take photographs and audio-visual footage at our premises, or off-site locations during meetings, celebrations, team-building activities and other corporate gatherings, we either request your consent (if required under applicable law) or rely on our legitimate interests to document our corporate culture and brand in our marketing materials, to attract new talent and inform clients and stakeholders about our activities, and keeping a historical archive of corporate events.

### Accessibility

We collect Accessibility Data where required for the purpose of facilitating events involving or access to our premises, we rely on your explicit consent as our lawful basis for processing this personal data, as this type of information is classed as “special category” or “sensitive” data.

## **8. CHANGE OF PURPOSE**

Where your local law requires us to do so, we will use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. Please also note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

## **9. DATA TRANSFERS TO OTHER COUNTRIES**

Your personal data may be transferred to and processed in other countries where laws governing the processing of your personal data may be less stringent than the laws in your country (including jurisdictions outside the European Union (EU), European Economic Area (EEA), or United Kingdom (UK)).

To deliver our services to you, it is sometimes necessary for us to share your personal data outside the EU, EEA, or UK, for example:

- with MarshBerry offices or entities outside the DIFC, EU, EEA, or UK
- with your and our service providers located outside the DIFC, EU, EEA, or UK
- if you are based outside the DIFC, EU, EEA, or UK
- where there is an international dimension to the matter in which we are advising you
- if one of our members of staff needs to access it remotely while they are travelling outside the DIFC, EU, EEA, or UK.

In such cases, where required by local law, we will ensure that there are adequate safeguards in place to protect your personal data. Depending on the location of the MarshBerry entity or office exporting the relevant personal data, this adequate safeguard might be a data transfer agreement with the recipient based on standard contractual clauses approved by the DIFC Commissioner of Data Protection or the European Commission or the International Data Transfer Agreement or Addendum approved by the UK Information Commissioner’s Office (ICO). Where we are legally required to do so, further details of these transfers and copies of these agreements are available from us on request.



By using our website and services, to the extent required and valid under your local law, you explicitly consent to your personal data being transferred and processed this way.

## **10. YOUR CHOICES REGARDING DIRECT MARKETING**

We may periodically send you free newsletters, surveys, offers, and other promotional materials related to our services which we believe are useful for you, if you have opted-in to receive such messages via email or any other electronic channel where such opt-in is required under your local law.

If you do not wish to receive such communication anymore, you will always have the opportunity to “opt out” or withdraw your consent by following the unsubscribe instructions provided in each of our direct marketing emails or by contacting us directly (please see our contact information at “How to contact us” below).

Users of the MarshBerry website have the option to subscribe to the MarshBerry newsletter(s). They must use an input screen and must transmit certain personal information as indicated on that screen to MarshBerry.

MarshBerry informs its customers and business partners about services and updates within the company at regular intervals through the newsletter(s). In general, you can only receive the newsletter if (1) you have a valid email address and (2) you are registered to have the newsletter sent to them. Where required under your local law, a confirmation email is sent to the email address you enter to receive the newsletter. This confirmation email is used to ensure the email address owner is you who has authorized the newsletter to be sent.

When you register for our newsletter, we save the IP address assigned to the computer system you are using by the internet service provider (ISP) at the time of registration, as well as the date and time of registration. We are required to record this data to track any (potential) misuse of your email address at a later date and for the legal security of MarshBerry.

In addition, newsletter recipients may receive information via email if necessary to provide the newsletter service or to register for this service, for instance if there are changes to the newsletter service or changes to technical circumstances. Personal information recorded to provide the newsletter service is never transmitted to third parties.

## **11. NEWSLETTER TRACKING**

Our newsletters contain so-called tracking pixels. A pixel-code is a thumbnail image embedded in emails sent in HTML format to enable log file recording and analysis. This allows a statistical evaluation of the success or failure of online marketing campaigns. By means of the embedded pixel-code we can see if and when an email was opened by the subscriber and which links in the email were called up by them.

We store and evaluate such personal data collected via the tracking pixels contained in the newsletters in order to optimize the dispatch of the newsletters and to adapt the content of future newsletters even better to the interests of the respective recipient. Where required under local law, we obtain consent for the tracking as part of the consent collected for the subscription. You are entitled at any time to withdraw your consent you have given in this regard when registering for the newsletter. After your withdrawal, we will delete this personal data. Unregistering for the newsletter is automatically interpreted by us as such withdrawal.

## 12. YOUR PRIVACY RIGHTS

Depending on your location, you may have various rights in relation to your personal data towards MarshBerry.

These rights may include:

- Request access to your personal data (a “data subject access request”). This means you can receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of your personal data: This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. You can ask us to remove personal data where there is no good reason for us continuing to process it. You also have this right where you have successfully exercised your right to object to processing, where we may have processed your data unlawfully or where we are required to erase your personal data to comply with law. We may not always be able to comply with your request where there are particular legal reasons.
- Object to processing of your personal data where we rely on a legitimate interest basis and if the processing impacts on your fundamental rights and freedoms. **You can also object to direct marketing.** In some cases, we may demonstrate that we have grounds to process your data which override your rights and freedoms.
- Request restriction of processing. You can ask us to suspend the processing of your personal data: if you want us to establish the data's accuracy; where our data use is unlawful but you do not want us to erase it; where you need us to hold the data even if we no longer need it, to establish, exercise or defend legal claims; or you have objected to use of data but we need to verify whether we have overriding legitimate grounds to use it.
- Request a data transfer. We will provide to you, or your chosen third party (where applicable), your personal data in a structured, commonly used, machine-readable format. This only applies to automated information which you provided consent for us to use or necessary to perform a contract with you.
- Withdraw consent at any time where we rely on consent to process your personal data. This will not affect the lawfulness of processing carried out before you withdraw your consent.

In addition, depending on your location, you may have the right to make a complaint to the competent supervisory authority. We would, however, like the opportunity to assist you with any concerns before you approach the competent supervisory authority so please contact us in the first instance using the details below.

Note that there may be exceptions to certain rights in particular, taking account of the nature of our work. For example, regulatory rules may mean that certain data cannot be disclosed in response to a request.

MarshBerry will not discriminate against you for exercising any of your data protection rights. This means we will not deny you services, charge you different prices, or provide a different level or quality of services because you have exercised your rights under this notice.

## 13. DATA SECURITY

As the party responsible for processing this data, MarshBerry has implemented security practices and processes and taken many different technical and organizational measures to provide protection for personal information processed through this website. However, in general, all transmissions of data over



the internet may be affected by gaps in security, and it is not possible to guarantee absolute protection. Because of this, all affected parties are also free to provide their personal information through alternative pathways, for instance over the telephone.

#### **14. DATA RETENTION**

Statutory retention periods are used as the criteria for how long our company archives personal information.

As a general rule, we will delete your personal data when it is no longer necessary for the purposes for which the data has been used by us. In case we retain personal data based on our legitimate interests, we will store such personal data until your interests in the deletion override our interests in retaining the personal data. If our legal basis is consent, we will retain the data until you revoke your consent or your personal data is no longer needed for the purpose for which it was stored.

If the purpose for which data was saved is eliminated, or if the archiving term specified by European regulators and issuing bodies expires, personal information is routinely blocked or deleted according to statutory regulations.

More detailed retention periods applicable for the processing of your personal data may be requested from us.

#### **15. HOW TO CONTACT US**

If you have any additional questions or concerns about this Global Consumer Privacy Notice or our privacy policies and practices, please contact us at the below.

- **For all Europe-based requests:** the Data Protection Officer (DPO), at [dataprotectionofficer@lincolninternational.com](mailto:dataprotectionofficer@lincolninternational.com).
- **For all other jurisdictions, including the DIFC:** the MarshBerry Compliance Department at [compliance@marshberry.com](mailto:compliance@marshberry.com) or 28601 Chagrin Blvd., Suite 400, Woodmere, OH 44122.

#### **16. CHANGES TO THIS PRIVACY NOTICE**

This Privacy Notice was last modified on May 8, 2026. This document is a notice to you and not a contract between us. We may occasionally modify or amend it from time to time. When we make changes to this Privacy Notice, we will update the revision date at the top of this Privacy Notice. Where those changes are material, we will take steps to let you know. The new modified or amended Privacy Notice will apply from that revision date. Please always verify whether you have consulted the latest version of the Privacy Notice.

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