

## Shareholder Privacy Policy

Last updated: November 2024

### Introduction

This privacy policy helps you to understand how we use your personal data and who we share it with.

This privacy policy applies to you if you are a:

- Registered shareholder of NEXT plc
- Executor, representative or beneficiary of a deceased shareholder
- Beneficial owner of NEXT plc shares who has exercised information rights
- Payee under a dividend mandate instruction

If you are also a NEXT customer, you should refer to the separate privacy policy at [www.next.co.uk/privacy](http://www.next.co.uk/privacy) which covers the personal data which we collect from you in relation to NEXT products and services which you purchase as a NEXT customer.

If you are a NEXT employee, please refer to the employee privacy policy which also applies to you and is located on the company's internal intranet and on the NEXT Employee Portal.

We change the terms of this privacy policy from time to time and you should check it regularly. The last updated date is shown at the beginning of the document. If we make any material changes we will take steps to bring it to your attention.

### Who we are

When we say "we", "our" or "us" in this policy we are referring to NEXT plc who are the data "controller", which means we are responsible for deciding how and why your personal data is used. We are also responsible for making sure it is kept safe, secure and handled legally.

We operate to the highest standards when protecting your personal data and respecting your privacy. If you have any questions about your personal data, or how we use it, you can contact our Data Protection Officer via email at [dataprotection@next.co.uk](mailto:dataprotection@next.co.uk) or by writing to our registered office at the following addresses:

**UK registered address:** Data Protection Officer, NEXT Group, Desford Road, Enderby, Leicester, LE19 4AT.

**EU registered address:** Data Protection Officer, NEXT Retail (Ireland) Ltd, 13–18 City Quay, Dublin 2, D02 ED70, Ireland.

## Your rights

You have a number of 'Data Subject Rights' below is some information on what they are and how you can exercise them. There is more information on the Information Commissioner's website at [ico.org.uk/for-the-public](http://ico.org.uk/for-the-public), or on your local [Data Protection Authority](#) website.

- Right of access - You have the right to request a free copy of the personal data that we hold about you.
- Right to rectification - If you think any of your personal data that we hold is inaccurate, you have the right to request it is updated. We may ask you for evidence to show it is inaccurate.
- Right to erasure (also known as the Right to be Forgotten).
- Right to restriction of processing - You have the right to request that we stop processing, or delete, your personal data that we hold. If you exercise this right, we will keep a note of your name linked to your request and it won't prevent us from processing any new data you provide to us subsequently.
- Right to data portability - You have the right to ask us to electronically move, copy or transfer your personal data in a machine-readable format.
- Rights with regards to automated decision making, including profiling - We sometimes use your personal data to make decisions by automated means. This involves us analysing your account activity including applications, orders, payments etc. We do this to confirm your identity, prevent and detect crime, and lend responsibly. This automated decision making is necessary if you would like to continue to shop with us online. You have a right to reject automated decisions, but it may mean that you can only shop with us in our stores.
- Right to withdraw Consent - Where we are relying on your consent for processing you can withdraw or change your consent at any time.

The above rights may be limited in some circumstances, for example, if fulfilling your request would reveal personal data about another person, if you ask us to delete data which we are required to have by law, or if we have compelling legitimate interests to keep it. We will let you know if that is the case and will then only use your data for these purposes. You may also be unable to continue using our services if you want us to stop processing your personal data.

If you have any general questions or want to exercise any of your rights, please contact [dataprotection@next.co.uk](mailto:dataprotection@next.co.uk). Our security procedures mean that we may need to request proof of identity before we disclose personal data to you in response to any request.

We encourage you to get in touch if you have any concerns with how we collect or use your personal data. You do however also have the right to lodge a complaint directly with the Information Commissioner's Office, the data protection regulator in the UK, their contact details can be found on their [website](#)

## The lawful bases we use to process data

We will only ever process your data if we have a lawful basis to do so. The lawful bases we rely on are;

- **Contract** – In the performance of our contract with you in accordance with our Articles of Association, to manage your shareholder rights and to meet our obligations to you as a shareholder.
- **Consent** – This is where we have asked you to provide explicit permission to process your data for a particular purpose.
- **Legitimate Interests** – Where we have a legitimate interest, for example, to operate our business and keep you, our shareholders, informed about our products and services but never at the expense of your privacy rights.
- **Legal Obligation** – This is where we have a statutory or other legal obligation to process the information, such as to meet our legal and regulatory responsibilities to our regulators, tax officials, law enforcement, or other relevant parties

## The data we collect and how we use it

We have appointed Equiniti Limited in accordance with the Companies Act to manage our register of shareholders. Equiniti Limited and other Equiniti Group entities ("Equiniti") maintain the NEXT shareholder register and processes shareholders' personal data on our behalf.

Your personal data is collected when you provide it to us, to Equiniti or to other third parties we engage to carry out services on our behalf, for example when you provide information in writing or via Equiniti's website. Your data is also collected when you exercise rights attached to your shares, such as voting. Your data might also be provided to us or to Equiniti by third parties, for example by an agent through which you trade in NEXT shares.

The data includes the following, however please note this list is not exhaustive:

### To provide you with access to an account

*Lawful basis: Contract*

- To register an account with us we capture data such as your name, contact information and a password to protect your account (account data). We use the same data on an ongoing basis to manage and provide secure access to your account and provide the services you request.

### To manage the shares you hold with us

*Lawful basis: Contract/Legitimate Interest*

- When you hold or purchase shares with us we will keep a record of the number you hold and a record of any past and present transactions.
- Manage your shareholding in NEXTplc and maintain the share register.
- We will keep a record of all dividends paid/payable to you.
- With your consent, we will store your bank account number and sort code so we can process payments to you.
- We will keep a record of your attendance to shareholder meetings along with a record of any votes you cast.

# NEXT

- Allow you to exercise your rights as a shareholder, such as the right to speak and vote at shareholder meetings.
- We will manage any corporate actions that we may undertake, such as rights issues.
- We will keep details and where relevant, copies of communications between us, your communication preferences and if you are a beneficial owner, any information rights you have exercised.
- We will keep a record of any special instructions you have made relating to your shares and in the event of your death, we will keep a record of the date that occurred and the names and contact details of your personal representatives

## **To Keep in touch with you**

*Lawful basis: Consent/Contract*

- We will keep a record of your contact preferences.
- We will make shareholder communications and shareholder meeting materials available to you, such as Annual Report and the Notice of Annual General Meeting.
- We will respond to any correspondence or questions you have raised with us.
- Where necessary we may contact you in relation to our issuer obligations.
- If we have lost contact with you, we may employ tracing agents to find you or your beneficiaries to reunify your holding to the person(s) entitled to it.

## **How long we keep your personal data for**

Your personal data will be kept for as long as is reasonably required to achieve the purposes for which it was collected. Your record on the shareholder register will be maintained while you are a shareholder of NEXT. If you cease to hold NEXT shares, your data will be kept for a period of up to 12 years following the last update to your record on the shareholder register, or for as long as is necessary to resolve any outstanding matters relating to your shareholding or to meet legal regulatory or tax requirements.

## **International Transfers**

Our main operations are based in the UK and your personal data is generally processed, stored and used within the UK. In some instances your personal data may be processed outside the UK. We also work with suppliers and partners who may make use of Cloud and /or hosted technologies across multiple geographies.

If you are outside of the UK we will transfer the personal data that we hold on you to the UK to facilitate your shares and account.

Where we need to transfer your personal data outside the UK, and if the recipient country has not been determined as providing an equivalent adequate level of protection as the UK, we will use one of the following safeguards:

- The use of European Commission approved standard contractual clauses in contracts for the transfer of personal data to third countries; and/or
- The International Data Transfer Agreement or Addendum for the transfer of personal data to third countries.

## **Keeping your personal data secure**

We always ensure that personal data is secure by continuously developing our security systems and training for our employees. We have implemented appropriate technical

and organisational security measures designed to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, and other unlawful or unauthorised forms of processing, in accordance with applicable law.

## **Third-party apps, websites and services**

IDX does not transfer personal data to third parties. However, for data processing purposes it may be necessary for Investis to allow its employees in other regions outside the United Kingdom (UK) to access your personal data. If you use any third-party apps, websites or services to access our services, your usage is subject to the relevant third party's terms and conditions, cookies policy, and privacy policy. For example, if you interact with us on social media, your use is subject to the terms and conditions and privacy policies of the relevant social media platform (Facebook, X etc.). The same stands if you use third-party services, like Amazon's Alexa, as your use of the service is subject to their applicable terms and conditions.

## **How you can get in touch**

Should you need to contact our Data Protection Officer please email: [dataprotection@next.co.uk](mailto:dataprotection@next.co.uk) or you can write to:

### **UK registered address:**

Data Protection Officer  
NEXT Group  
Desford Road  
Enderby  
Leicester  
LE19 4AT

### **EU registered address:**

Data Protection Officer  
NEXT Retail (Ireland) Ltd  
13-18 City Quay  
Dublin 2  
D02 ED70  
Ireland