

Shareholder Privacy Notice

Date last updated: 17 September 2020

1. Introduction

If you are an acquirer of COMPASS Pathways plc shares or ADRs (“Shares” or “Shareholding”), this shareholder privacy notice (“Shareholder Privacy Notice”) sets out how COMPASS Pathways plc (“COMPASS Pathways”, “we”, “our” or “us”) collects and uses information about you. Please note that this Shareholder Privacy Notice does not apply to other personal data which we collect about you through our website (a link to the website privacy policy can be found here: <https://compasspathways.com/privacy/>).

COMPASS Pathways has its address at 3rd Floor, 1 Ashley Road, Altrincham, Cheshire WA14 2DT, United Kingdom.

Please read this Shareholder Privacy Notice carefully as it applies to you as an acquirer of Shares in COMPASS Pathways.

2. What personal data we collect and how

The personal data we collect about you is needed to administer your COMPASS Pathways Shareholding and maintain our share register. We explain the different ways we use your personal data below. If you do not provide us with the correct information or ask us to delete it, we might not be able to help you with the purchase of Shares.

We may collect and use the following personal data about you to manage your Shareholding: your contact details and other information to confirm your identity and your communications with us. This includes: your name, gender, address, phone number, date of birth, email address, your bank/building society details and other financial information, your communications with us.

We collect this information when you provide it to us directly or we create it ourselves or collect it from other organisations.

3. Why we use your personal data

We will use your personal data for the following purposes:

To manage your Shareholdings

If you have bought Shares, we are entitled to process your information so we can carry out our obligations to you as a shareholder, as follows:

- include you on our share or ADR register;
- make dividend payments;
- complete transactions that you instruct us to undertake;
- retain records of your instructions and keeping your Shareholding account up-to-date;
- send you information about your Shareholdings, corporate actions, changes to our services, voting instructions and our shareholder meetings;
- give information to Neville Registrars Ltd, our share registrar, or [Citi, our custodian for ADRs] so they can manage your Shareholding on our behalf;

- provide you with transaction records/confirmation notices and statements as required by financial regulations.

In our legitimate interests as a business

We will use your personal data if we consider it is in our legitimate business interests so that we can operate as an efficient and effective business in administering our shares, as follows:

- share within the COMPASS Pathways group for administrative purposes;
- make efforts to trace you if we lose contact with you, for example, to reunite you with your assets;
- create aggregated and anonymised information for further use;
- to improve our service including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- share with our insurers and insurance brokers where required for underwriting our risks and as part of ongoing risk assessments;
- to collect debt, bring or defend claims – see below for more information;
- to prevent and detect crime, and secure and protect our network – see below for more information; and
- where you have made an enquiry with us about how to invest in Shares, we keep a log of your request and will contact you with details on how to make a purchase (in each communication you will be provided with details on how to opt out of future communications).

To collect debt

If you are an individual shareholder, we might ask a debt recovery agency to collect monies owed to us. We will give them information about you (such as your contact details) and your account (the amount of the debt) and may choose to sell the debt to another organisation to allow us to receive the amount due.

To meet our legal and regulatory obligations

We might have to share personal data about you to meet our legal and regulatory obligations, as follows:

- To account for tax, duties and other legal and regulatory obligations: under legislation, such as the UK Social Security legislation, we may have to share personal data to submit returns to the relevant regulatory authorities and deduct tax and duties (such as income tax). This includes disclosing information to Her Majesty's Revenue & Customs (HMRC). We may also have to share your personal data with regulators and supervisory authorities, for example, domestic or foreign tax authorities, the Department for Work and Pensions (DWP), Her Majesty's Courts and Tribunals Service (the courts), the Financial Conduct Authority, the London Stock Exchange plc or the operator of any market on which you may hold investments, as part of our legal obligations in providing the products/services.
- To law enforcement agencies: under investigatory powers legislation, we might have to share personal data about you with government and law enforcement agencies, such as the police, to help detect and stop crime, prosecute offenders and protect national security.

4. How long we keep your personal data

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

5. Sharing your personal data

There are circumstances in which we may share your personal data with third parties, as follows:

- **Group companies:** other companies within the COMPASS Pathways group;
- **Service providers:** we use service providers to process personal data on our behalf, including: banks and other payment service providers to process your entitlements, payments and manage any savings; stockbrokers and market makers who execute transactions we make on your behalf; service suppliers to facilitate email, IT and administration services; our professional advisors, for example, our lawyers and technology consultants, when they need it to provide advice to us;
- **Third party providers:** such as Trustees or Nominees, when either we or you have requested their services, e.g. to deliver or manage shares;
- **Fraud detection agencies:** as part of our identification procedures;
- **Your Official Receiver or appointed insolvency practitioner:** if we receive notice of your insolvency, bankruptcy or insolvency proceedings/arrangement.

Where we use another organisation, we still control your personal data. And we have strict controls in place to make sure it's properly protected.

If there is a change (or expected change) in who owns us or any of our assets, we might share personal data to the new (or prospective) owner. If we do, they will have to keep it confidential.

Finally, the section above describes the situations in which your personal data is shared with other organisations, government bodies and law enforcement agencies. When we share your information with other organisations we will make sure it is protected, as far as is reasonably possible.

6. Storing your personal data

In order to process personal data for the purposes set out in this Shareholder Privacy Notice, we may transfer your personal data to third parties and other companies in our group that are based outside the United Kingdom and/or the European Economic Area ("EEA"), such as to the United States. Data protection laws in such countries may be less stringent than or otherwise different from the data protection laws in the United Kingdom or the EEA.

When your personal data is transferred outside the United Kingdom or the EEA we will ensure such transfers shall be made pursuant to applicable data protection laws by ensuring at least one of the following safeguards is implemented:

- The transfer is subject to a legally binding and enforceable commitment on the recipient to protect the personal data, including, where required, implementation of the European Commission approved Standard Contractual Clauses.
- The transfer is made subject to binding corporate rules.
- The transfer is based on a derogation from restrictions on transferring personal data outside the United Kingdom or the EEA (such as, where you give your consent, the transfer is necessary for the performance of contract with you, or the transfer is necessary for the establishment, exercise or defence of legal claims).

You may contact us using the “Questions” section for more information.

7. Your rights

To keep your personal data accurate, current, and complete, please contact us using the information provided in the “Questions” section below. We will take reasonable steps to update or correct personal data in our possession that you have previously submitted to us.

You may have the right to: request (a) access to the personal data we hold about you; (b) request we correct any inaccurate personal data we hold about you; (c) request we delete any personal data we hold about you; (d) restrict the processing of personal data we hold about you; (e) object to the processing of personal data we hold about you; and/or (f) receive any personal data we hold about you in a structured and commonly used machine-readable format or have such personal data transmitted to another company.

We may ask you for additional information to confirm your identity and for security purposes, before disclosing information requested to you. We will process any request in line with any local laws and our policies and procedures. You also have the right to lodge a complaint about how we process your personal data with the supervisory authority in your country.

If you wish to exercise any of your rights, please contact us using the information provided in the “Questions” section below.

8. Changes to the Shareholder Privacy Notice

It may be necessary for COMPASS Pathways to make changes to this Shareholder Privacy Notice. COMPASS Pathways reserves the right to update or modify this Shareholder Privacy Notice at any time and from time to time without prior notice.

Please review this Shareholder Privacy Notice periodically, and especially before you provide any personal data. This Shareholder Privacy Notice was last updated on the date indicated above.

9. Questions

If you have any questions about this Shareholder Privacy Notice or how we process your personal data, you can use the following contacts:

- If you are based within the EEA, you may contact our EU Representative using the following details: DPR Group (Data Protection Representative Limited), www.dpr.eu.com, 1-2 Marino Mart, Fairview, Dublin 3, Ireland.
- If you are based outside of the EEA, you may contact our Data Privacy Representative using the following details: legal@compasspathways.com.