

ROLLS-ROYCE HOLDINGS PLC REGISTERED SHAREHOLDER PRIVACY POLICY

INTRODUCTION

This privacy policy is issued on behalf of Rolls-Royce Holdings plc (Rolls-Royce) operating within the United Kingdom, who is the relevant controller of your personal information.

This privacy policy extends to the share registry services which are carried out by Computershare Investor Services PLC ("**Computershare**"). We have appointed Computershare under the rules of the Companies Act to manage our register of shareholders. Computershare's role as registrar includes keeping an up-to-date record of shares held by shareholders, administration of shareholder payments, managing share transfers, issuing share certificates and supporting other regulatory functions. In carrying out registry services, Computershare processes personal information about you as a shareholder on our behalf. You are also recommended to view [Computershare's privacy policy](#) which can be found on www.computershare.com

When we mention "Rolls-Royce", "we", "us" or "our" we are referring to a relevant company in the Rolls-Royce Group or Computershare.

If you use any of the apps and engagement tools we make available to our shareholders (for example the Computershare Investor Centre, Share Dealing Site, Proxy Voting Site, Employee Share Plans site and Alert Services) ("**Online Services**"), you should be aware of any additional privacy notices that are made available for the relevant Online Service. This privacy policy supplements, but does not override, those notices.

This privacy policy is separate from and not intended to override the terms of any contract we have with you or your rights under data protection laws.

We will amend this privacy policy from time to time to keep it up to date with current legal requirements and the way we operate our business. Please regularly check these pages for the latest version

WHAT PERSONAL INFORMATION WE COLLECT WHEN YOU BECOME A REGISTERED SHAREHOLDER

Rolls-Royce will collect and use personal information such as your name, contact details, the votes you cast and the Reference Number attributed to you by us as a Rolls-Royce

shareholder. We collect this personal information when you provide details to us directly or through your agent, stock broker or share plan administrator, for example, on shareholder application forms or stock transfer forms. We also collect personal information when you register for or use any of our Online Services or our website.

We use your personal information (with the support of Computershare):

- to manage your shareholding interest in Rolls-Royce
- to allow you to exercise your rights as a shareholder
- to keep our shareholder register up-to-date (for example where you move address or change your name)
- to contact you with shareholder related information, including important information about shareholder payments, the annual report and accounts and Notice of our Annual General Meeting and any other relevant information that relates to your Rolls-Royce shareholding.
- to address any queries you raise with us

We encourage you to use Computershare's Investor Centre to manage the information we provide to you as it provides a secure online platform to help you manage your shareholdings and communication preferences.

Respecting privacy rights

We are committed to collecting and using personal information in accordance with applicable data protection laws.

Wherever we collect or use personal information, we will make sure we do this for a valid legal reason. This will be for at least one of the following purposes:

- to manage your shareholder rights and our obligations to you as a shareholder, in accordance with our Articles of Association and applicable laws;
- to meet responsibilities we have to our regulators, tax officials, law enforcement, or otherwise meet our legal responsibilities;
- for any other purposes we identify as relevant to further our business interests but never at the expense of your privacy rights

How we share your personal information

We will only share personal information with a limited number of trusted third parties who work with us to help deliver our services, in order to fulfil our legal obligations or at your request. Such third parties include:

- Computershare, as our Registrar, who manages our share register and Georgeson, a subsidiary of Computershare, who provide a service to help trace our shareholders where records need to be updated;
- payment providers who help us manage payments to our shareholders,;
- solicitors and professional service firms who provide us with legal support in relation to our services or any litigation;
- service providers who help operate our IT and back office systems;
- regulators who regulate how we operate, these include the Financial Conduct Authority, the London Stock Exchange, HMRC, the Takeover Panel and the Information Commissioner's Office;

We will also share your personal information in the following circumstances:

- Where we need to do so to comply with our legal or regulatory obligations (which may include sharing information with regulators).
- In an effort to trace you if we lose contact with you.
- Where necessary to protect or defend our legal rights or the legal rights of another company or person.
- If our business, or any part of it, is transferred or sold, we will transfer your personal information to the company taking over our role, which could include a purchaser or the provider replacing us.
- If we transfer the management of our share register to another service provider

We will never sell your information to anybody for unsolicited marketing.

Retaining personal information in our systems

We generally only keep personal information for as long as is reasonably required for the reasons explained in this privacy policy. We do keep certain records - which may include personal information - for more extended periods e.g. after you have sold your shareholding, if we need to do this to meet legal, regulatory, tax or accounting needs.

For instance, we are required to retain an accurate record of dealings with us, so we can respond to any complaints or challenges from you or others which might be raised later. We will also retain files if we reasonably believe there is a prospect of litigation.

We maintain a data retention policy which we apply to the records we hold.

YOUR RIGHTS

You have legal rights under data protection laws in relation to your personal information.

We may ask you for proof of identity when making a request to exercise any of these rights. We do this to ensure we only disclose information where we know we are dealing with the right individual.

We will not ask for a fee, unless we think your request is unfounded, repetitive or excessive. Where a fee is necessary, we will inform you before proceeding with your request.

We aim to respond to all valid requests within one month. It may however take us longer if the request is particularly complicated or you have made several requests. We will always let you know if we think a response will take longer than one month. To speed up our response, we may ask you to provide more detail about what you want to receive or are concerned about.

We may not always be able to do what you have asked, for example if it would impact the duty of confidentiality we owe to others or if we are otherwise legally entitled to deal with the request in a different way.

To access personal information

You can ask us to confirm whether or not we have and are using your personal information.

You can ask to get a copy of your personal information.

To withdraw consent

In circumstances where we have asked for your consent to use your information, you will always have the right to withdraw such consent. Please [contact us](#) if you want to do this. If you withdraw your consent, we may not be able to provide certain products and services to you. If this is the case, we will tell you at the time you ask to withdraw your consent.

To correct / erase personal information

You can ask that we rectify any information about you which is incorrect. We will be happy to rectify such information but will need to verify the accuracy of the information first. Please contact [Computershare](#) in the first instance if any of your shareholding details are incorrect.

You can ask that we erase your personal information if you think we no longer need to use it for the purpose we collected it from you.

You can also ask that we erase your personal information if you have either withdrawn your consent to us using your information (if we originally asked for your consent to use your information), or exercised your right to object to further legitimate use of your information, where we have used it unlawfully or where we are subject to a legal obligation to erase your personal information.

We may not always be able to comply with your request, for example where we need to keep using your personal information in order to comply with our legal obligation or where we need to use your personal information to establish, exercise or defend legal claims.

To restrict our use of personal information

You can ask that we restrict our use of your personal information in certain circumstances, for example

- where you think the information is inaccurate and we need to verify it;
- where our use of your personal information is not lawful but you do not want us to erase it;
- where the information is no longer required for the purposes for which it was collected but you need it to establish, exercise or defend legal claims; or
- where you have objected to our use of your personal information but we still need to verify if we have overriding grounds to use it.

We can continue to use your personal information following a request for restriction where we have your consent to use it, or you need to use it to establish, exercise or defend legal claims, or we need to use it to protect the rights of another individual or a company.

To request a transfer of personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another

data controller (e.g. another company). You may only exercise this right where we asked for your consent to use your personal information. This right does not apply to any personal information which we hold or process based on our legitimate interest or which is not held in digital form.

To obtain a copy of our safety measures

You can ask for a copy of, or reference to, the safeguards we have put in place when your personal information is transferred outside of the European Economic Area. We are not required to share details of these safeguards where sharing such details would affect our commercial position, or create a security risk.

You can contact us for more information

If you are not satisfied with the level of information provided in this privacy policy, you can ask us about what personal information we have about you, what we use your information for, who we disclose your information to, whether we transfer it abroad, how we protect it, how long we keep it for, what rights you have, how you can make a complaint, where we got your data from and whether we have carried out any automated decision making using your personal information.

CONTACT US

The primary point of contact for all queries arising from this privacy policy or how your personal information is handled, including requests to exercise your rights set out in this lease contact us at data.privacy@rolls-royce.com and we will do our best to assist you.

Write to: Data Privacy, Rolls-Royce plc, Moor Lane, Derby, DE24 8BJ

If you would like to amend any details held on our shareholder register then in the first instance you should contact [Computershare](#) who maintain our register of shareholders.

Our supervisory authority:

If you are not happy with the way we are handling your information, you have a right to lodge a complaint with your local data protection supervisory authority at any time. In the UK this is the Information Commissioner's Office (ICO) www.ico.org.uk.

We ask that you please attempt to resolve any issues with us before contacting the ICO.