

PRIVACY STATEMENT

Introduction

Semper Fiduciary Limited and its group companies (which in the rest of this statement we refer to collectively as "**Semper**", "**we**", "**us**" or "**our**") is committed to protecting your personal information. This Privacy Statement applies to our use of any personal information you provide to Semper or that we collect about you, including through our website.

"**Personal information**" (also known as "**personal data**") includes any information relating to an identified or identifiable individual.

Please read this Privacy Statement carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

We must sometimes collect and use personal information about you:

- to obey the laws and regulations that apply to our business
- to provide you with the best experience before you become our client
- if you apply for our services, to take the steps needed for you to be accepted as our client
- if you become our client, to fulfil our contract with you
- if you apply for a job with us, to ensure you have the appropriate skills and experience
- if you are an employee or service provider, to ensure we both fulfil our contract
- and/or
- to protect our interests and yours

We must use this information in line with all laws concerning the protection of personal information, including the Data Protection (Bailiwick of Guernsey) Law, 2017 (which in the rest of this Privacy Statement we refer to as the "**Data Protection Law**").

What information will Semper collect about you?

The personal data we collect about you depends on our relationship with you.

If you contact us through our website, we will ask for your name, email address, mailing address and telephone number, so that we can respond to you.

If you apply to become a client of ours, we will require you to give us extensive personal information, such as:

- your full name (and any former name(s) and contact information including your email address, residential address and telephone number
- information to check and verify your identity, e.g. your date of birth, such as copies of your passport or identification documents
- proof of your address such as a utility bill or bank statement
- information about your financial activities and assets, your connections with financial crime or terrorism, your family, your political associations and yours and your family's sources of wealth
- information to enable us to undertake credit or other financial checks on you
- your professional information, including the name of your employer
- your billing information, transaction and payment card information
- information about how you use our website, IT, communication and other systems.

Even if you are not our client or applying to be our client, fiduciary legislation and anti-money laundering legislation may require us to collect the above personal information about you if:

- you have a relationship with our client or prospective client or you are intended to benefit from our services

- you have an important role, interest or connection to one of the trusts, foundations, companies or other bodies that use our services or to which our services relate

If you have this type of connection to a client or prospective client and we cannot collect the required personal information directly from you, we may need to collect it from our client or prospective client.

Personal data revealing political opinions (which may be incidentally revealed by our questions about your political associations), criminal data and biometric data (which may be collecting during our client onboarding process) are called "special category data" under the Data Protection Law, which means that they have additional protection. See the section '**Special category personal data**' below.

We collect and use personal data for the purposes described in the section '**How will Semper use the information they collect about you?**' below. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you or to our client.

How will Semper collect personal information?

We collect most of this personal data directly from you - in person, by telephone, email and/or via our website. However, we may also collect information:

- from publicly accessible sources, e.g. the Guernsey Registry or Companies House
- directly from a third party, e.g. sanctions screening providers, credit reference agencies and customer due diligence providers
- from a third party with your consent, e.g. your bank or building society or your professional advisers
- from cookies on our website—for more information on our use of cookies, please see our cookie policy
- via our IT systems, e.g. through automated monitoring of our websites and other technical systems, such as our computer networks and connections, CCTV and

access control systems, communications systems, email and instant messaging systems.

How will Semper use the information they collect about you and for what reason(s)?

Under the Data Protection Law, we can only use your personal data if we have a proper reason, e.g.:

- where you have given consent
- to comply with our legal and regulatory obligations
- for the performance of a contract with you or to take steps at your request before entering into a contract
- for our legitimate interests or those of a third party.

A "**legitimate interest**" is when we have a business or commercial reason to use your personal data, so long as this is not overridden by your own rights and interests. We will carry out an assessment when relying on legitimate interests, to balance our interests against your own.

The table below explains what we use your personal data for and why.

What we use your personal data for	Our reasons
Providing services to you	To perform our contract with you or to take steps at your request before entering into a contract
Preventing and detecting fraud against you or us	For our legitimate interest, i.e. to minimise fraud that could be damaging for you and/or us
Conducting checks to identify our clients and verify their identity Screening for financial and other sanctions or embargoes	To comply with our legal and regulatory obligations

What we use your personal data for	Our reasons
<p>Other activities necessary to comply with professional, legal and regulatory obligations that apply to our business, e.g. under anti-money laundering and countering terrorist financing legislation or rules issued by our regulator</p>	
<p>To enforce legal rights or defend or undertake legal proceedings</p>	<p>Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect our business, interests and rights</p>
<p>Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies</p>	<p>To comply with our legal and regulatory obligations</p>
<p>Ensuring business policies are adhered to, e.g. policies covering security and internet use</p>	<p>For our legitimate interests, i.e. to make sure we are following our own internal procedures so we can deliver the best service to you</p>
<p>Operational reasons, such as improving efficiency, training and quality control</p>	<p>For our legitimate interests , i.e. to be as efficient as we can so we can deliver the best service to you</p>
<p>Ensuring the confidentiality of commercially sensitive information</p>	<p>Depending on the circumstances: —for our legitimate interests, i.e. to protect trade secrets and other commercially valuable information; —to comply with our legal and regulatory obligations</p>

What we use your personal data for	Our reasons
<p>Statistical analysis to help us manage our business, e.g. in relation to our financial performance, client base, services or other efficiency measures</p>	<p>For our legitimate interests, i.e. to be as efficient as we can so we can deliver the best service to you</p>
<p>Preventing unauthorised access and modifications to systems</p>	<p>Depending on the circumstances: —for our legitimate interests, i.e. to prevent and detect criminal activity that could be damaging for you and/or us; —to comply with our legal and regulatory obligations</p>
<p>Protecting the security of systems and data used to provide services Making copies and backups of data</p>	<p>To comply with our legal and regulatory obligations We may also use your personal data to ensure the security of systems and data to a standard that goes beyond our legal obligations, and in those cases our reasons are for our legitimate interests, i.e. to protect systems and data and to prevent and detect criminal activity that could be damaging for you and/or us</p>
<p>Updating and enhancing client records</p>	<p>Depending on the circumstances: —to perform our contract with you or to take steps at your request before entering into a contract; —to comply with our legal and regulatory obligations; —for our legitimate interests, e.g. making sure that we can keep in touch with our clients about new services</p>

What we use your personal data for	Our reasons
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	Depending on the circumstances: —to comply with our legal and regulatory obligations; —for our legitimate interests, e.g. to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
Marketing our services and those of selected third parties to: —existing and former clients; —third parties who have previously expressed an interest in our services; —third parties with whom we have had no previous dealings.	For our legitimate interests, i.e. to promote our business to existing and former clients
Credit reference checks via external credit reference agencies	For our legitimate interests, i.e. to ensure our clients are likely to be able to pay for our services
External audits, e.g. for the audit of our accounts	To comply with our legal and regulatory obligations
To share your personal data with members of our group and third parties that will or may take control or ownership of some or all of our business (and professional advisors acting on our or their behalf) in connection with a significant corporate transaction or restructuring, including a	Depending on the circumstances: —to comply with our legal and regulatory obligations; —in other cases, for our legitimate interests, i.e. to protect, realise or grow the value in our business and assets

What we use your personal data for	Our reasons
<p>merger, acquisition, asset sale, initial public offering or in the event of our insolvency</p> <p>In such cases information will be anonymised where possible and only shared where necessary</p>	
<p>Complying with the terms of our insurance policies</p>	<p>To comply with our legal and regulatory obligations</p>
<p>To ensure, once our relationship ends, that your affairs with us are concluded in an orderly manner and that any unresolved issues or disputes may be addressed fairly and professionally</p>	<p>To perform our contract with you</p> <p>To comply with our legal and regulatory obligations</p>
<p>If you are a job applicant, to evaluate and verify your suitability for a position</p>	<p>For our legitimate interests, i.e. to ensure that we employ people with the appropriate skills and experience for a particular position</p>
<p>If you are an employee or service provider, to:</p> <ul style="list-style-type: none"> • fulfil our contract with you, such as ensuring that you receive pay and benefits that are due • ensure that you fulfil your contract with us, such as by supervising and evaluating your performance and ensuring that those needing your services can contact you 	<p>To perform our contract with you</p> <p>To comply with our legal and regulatory obligations</p> <p>For our legitimate interests, i.e. to ensure our employees are performing their contract with us</p>

Special category personal data

Certain personal data we collect is treated as a special category to which additional protections apply under the Data Protection Law:

- personal data revealing political opinions
- biometric data (when used to uniquely identify an individual)
- criminal data.

Where we process special category personal data, we will also ensure we are permitted to do so under the Data Protection Law which imposes additional requirements, e.g.:

- that we have your explicit consent
- that the processing is necessary to protect your (or someone else's) vital interests where you are physically or legally incapable of giving consent or we cannot reasonably be expected to obtain your explicit consent

We do not use automated decision-making. If we intend to do so in the future, we will inform you before we start and explain why it is necessary and what rights you have to refuse, express your views, or appeal any automated decision.

What will Semper contact you about?

Semper may contact you:

- about any service you have signed up for, or where you have asked for information
- to send you further correspondence, when you have opted to receive it
- about information or documents you have provided to Semper
- if you are a client or person connected to our client, then as needed to carry out our services

Marketing

We will use your personal data to send you updates (by email, telephone or post) about our services, including new services.

We have a legitimate interest in using your personal data for marketing purposes (see above **'How will Semper use the information they collect about you and for what reason(s)?'**).

This means we do not usually need your consent to send you marketing information. If we change our marketing approach in the future so that consent is needed, we will ask for this separately and clearly.

You have the right to opt out of receiving marketing communications at any time by:

-
- using the 'unsubscribe' link in emails or

We may ask you to confirm or update your marketing preferences if you ask us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

We will always treat your personal data with the utmost respect and never share it with other organisations outside the Semper group for marketing purposes.

Will Semper share your personal information with anyone else?

We routinely share personal data with:

- companies within the Semper group
- third parties we use to help us run our business, e.g. compliance consultants, accountants, marketing agencies IT providers and website hosts;
- third parties approved by you, e.g. social media sites you choose to link your account to or third party payment providers;
- credit reference agencies;
- our insurers and brokers;
- our banks.

We only allow those organisations to handle your personal data if we are satisfied that they take appropriate measures to protect your personal data.

We, or the third parties mentioned, above occasionally also share personal data with:

- our and their external auditors, e.g. in relation to the audit of our or their accounts, in which case the recipient of the information will be bound by confidentiality obligations;
- our and their professional advisors (such as lawyers and other advisors), in which case the recipient of the information will be bound by confidentiality obligations;
- law enforcement agencies, courts, tribunals and regulatory bodies and authorities to comply with our legal and regulatory obligations;
- other parties that have or may acquire control or ownership of our business (and our or their professional advisers) in connection with a significant corporate transaction or restructuring, including a merger, acquisition, asset sale, initial public offering or in the event of our insolvency—usually, information will be anonymised but this may not always be possible. The recipient of any of your personal data will be bound by confidentiality obligations.

Who we share your personal data with - further information

If you would like more information about who we share our data with and why, please contact us (see '**Contacting Semper Fiduciary Limited**' below).

Where your personal data is held

Personal data may be held at our offices and those of our group companies, third party agencies, service providers, representatives and agents as described above (see above: '**Will Semper share your personal information with anyone else?**').

Some of these third parties may be based outside Guernsey, the United Kingdom and/or the European Union. For more information, including on how we safeguard your personal data

when this happens, see below: **'Will your personal data be transferred outside Guernsey?'**.

Will your personal data be transferred outside Guernsey?

We will transfer your personal information outside the Bailiwick of Guernsey, the United Kingdom, the European Union or a country or territory with equivalent data protection laws only if there are adequate safeguards to your personal information, or when you have given us your consent or it is necessary to perform the service that you have engaged us to do (unless the transfer is otherwise permitted or required by law). It is your right to have us inform you about whether the country or territory has equivalent data protection laws or other adequate safeguards and, if so, what those safeguards are.

If your personal information is transferred without adequate safeguards to a country or territory without equivalent data protection laws to Guernsey, you may not have the same rights there to keep your personal information secure and safe from abuse, nor the same ability to enforce those rights. You should keep this in mind when we ask for your consent to transfer your personal information to another country or territory.

Fiduciary laws require us to keep your personal information confidential. However, laws to deter financial crime create exceptions to this confidentiality, where we must report certain personal information about our clients and people connected to them to governmental authorities. We are also required by law to record details about companies, foundations and other bodies that we administer in public registers, which may include your personal information if you perform certain roles in respect of those bodies. If you are concerned about this, please ask us about it.

How long will Semper keep your personal information?

We will not keep your personal data for longer than we need it for the purpose for which it is used.

To fulfil our fiduciary duties, to conclude relationships in an orderly manner and to ensure that any disputes or unresolved issues may be addressed fairly and professionally, we have a policy of keeping copies of files for up to six years after our services end, before destroying them, unless we are required to keep them longer by law or regulation. If information in a file is part of a dispute or investigation after our services end, we may keep the information until the end of the dispute or investigation. If you would like details of our document retention policy or do not wish it to apply to your files, please contact us at the address at the end of this Privacy Statement.

As our business is supervised by a regulator, we are required from time to time to keep certain records to show our regulator that we are conducting our business properly and keeping client records accurate and up to date. This means that we may be required to keep your personal information in our files until the regulator no longer requires us to do so.

Can you find out what personal information Semper holds about you?

Under the Data Protection Law you have the right to confirm that we hold personal information about you and request copies of that information (unless you already have that information). This information will usually be provided free of charge but we reserve the right to charge you a fee if you request multiple copies or if the request is deemed unreasonably extensive. If you make a request, we will require you to prove your identity with 2 pieces of government-issued photo identity documents.

Guernsey fiduciary law protects the confidentiality of some trust information, which may limit your right of access under the Data Protection Law.

What other rights do you have about your information?

You have the right to request us to correct any incomplete or inaccurate information that we have about you. If you wish to do this, you should send us a written request explaining what information you want completed or corrected, and what is incorrect or why it is incomplete.

You have the right to ask us not to use the information until we have verified its accuracy

and completeness. We will tell you if we have provided anyone else with information which has turned out to be incorrect or incomplete, and we will have that other person erase, correct, complete or not use that information if it is practicable to do so and not disproportionate to the effort needed.

You may also ask us to erase incorrect or incomplete information if we no longer need it or if we do not have the right to hold it under the Data Protection Law.

If we need your consent to use your personal information, you may withdraw that consent at any time after you have given it by contacting us, either by using the contact details below or by emailing any Semper staff member.

You may also object to the processing of, or obtain a restriction of the processing of, your data and you can request the transfer of your data to another party. To the extent that we process your data automatically, you may ask us to provide you with your personal information in a commonly-used, machine-readable format. This will not apply to information we have in our files about you that we must keep by law, such as our background searches.

Please note that the rights set out above are subject to certain exemptions and conditions. We may decline to comply with any request to access, correct, delete or restrict the use of your information if there is a specific legal ground or exemption.

For more information on each of those rights, including the circumstances in which they apply, please contact us (see '**How to contact us**' below) or see the information on individuals' rights on the Information Hub on the Office of the Data Protection Authority's (the **ODPA**) website (<https://www.odpa.gg>).

How to make a complaint

If you believe that we have not complied with the Data Protection Law in a way that affects your personal information or your rights, you may make a complaint to the ODPA. ODPA

decisions may be appealed in Guernsey court. If you wish to appeal ODPa decision, you should do so quickly or you may lose your appeal right.

Changes to the Semper Privacy Policy

This Privacy Statement may be updated from time to time. We will post notices of updates on our website. If you use our website in the future, please check for updates.

Contacting Semper Fiduciary Limited

You can contact us at:

Semper Fiduciary Limited

3rd Floor, One Cornet Street

St Peter Port

Guernsey

GY1 1BZ

Phone: +44 1481 816444

If we have appointed a Data Protection Officer, he or she may be contacted at the above address.