

Sovereign Trust Consultancy (Bahrain) WLL Privacy Notice for provision of company formation and other incidental services (such as payroll, HR and corporate secretarial services) (the “Services”)

1. Purpose of this privacy notice

The purpose of this privacy notice is to explain what Personal Data we collect about you and how we process it in order to provide the Services to you. This privacy notice also explains your rights, so please read it carefully. If you have any questions, you can contact us using the information provided below under the ‘How to contact us’ section.

This Privacy Notice may be updated and/ or re-issued at any time, and we will provide you with notice of any such updates via either email and/or website.

2. What Personal Data is

‘Personal Data’ means any information, in any form, of an identified or identifiable individual, whether directly or indirectly, particularly through their personal identification number, or one or more of their formal, physiological, intellectual, cultural, economic, or social identity.

3. ‘Sensitive Personal Data’ refers to any personal information that directly or indirectly discloses the individual's ethnic or racial origin, political, or philosophical opinions, religious beliefs, trade union affiliation, criminal record, or any data relating to their health or sexual status. For the avoidance of doubt, currently Sovereign does not require and/or need to process your sensitive personal data in order to provide you with the Services.

4. Personal Data we collect

The Personal Data we collect about you will be the minimum necessary to provide the Services. The type of Personal Data we collect is outlined in the table below in the section entitled ‘Purposes, lawful bases and retention periods’.

5. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone including but not limited to any information exchanged over any private messaging application, text or email and/or via our website.

6. Purposes, lawful bases and retention periods

We will only use your Personal Data when the law allows. Most commonly, we will use your Personal Data in the following circumstances:



Categories of individuals	Categories of Personal Data	Purpose of Processing	Lawful Basis	Retention Period
Client	<p>A. Identity information - Name, nationality, date of birth.</p> <p>B. Contact information – Your home address, your phone number, your personal email address and your residency status in Bahrain (if applicable).</p> <p>C. Employment information – Your employer’s details, i.e name and address, your business establishment’s name and email address.</p> <p>D. Commercial information – Sources of income and your record of investments.</p> <p>Financial information – your salary with the</p>	<p>To be able to identify you as a unique individual and to facilitate the starting of the business relationship.</p> <p>To be able to contact you in relation to the Services and provide updates, newsletters, updates to the local law. Furthermore, we are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p> <p>We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p> <p>We are required to request and maintain this information to satisfy the Know Your Client (KYC) requirements.</p> <p>We are required to request and maintain this information to satisfy</p>	<p>Contractual and to comply with a legal obligation</p> <p>Contractual and to comply with a legal obligation</p> <p>Comply with a legal obligation</p> <p>Comply with a legal obligation</p>	<p>It is our normal practice to retain documents relating to our engagement as prescribed in the local Bahrain regulations (which is in between five to ten years (5-10) depending on the jurisdiction in which you are incorporated or registered) from the end of the relevant Service.</p>



	benefits and allowances and your bank account details	the Know Your Client (KYC) requirements.	Comply with a legal obligation	
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Where Personal Data is processed because it is necessary for the implementation of a contract to which you are a party, we will be unable to provide our services without the required information.

7. Sharing your Personal Data

In the course of providing you with the Services – we may need to share your Personal Data with the following third parties:

1. Our affiliates, where necessary for the purpose of providing the Services.
2. Certain service providers we have retained in connection with the Services we provide, such as translators or other necessary entities.

When we carry out searches, using the relevant platforms and/or regulators for the purposes of processing your application and/or during the course of your relationship with us such as money laundering and terrorist financing checks, credit risk reduction and other fraud and crime prevention purposes and companies providing similar services, including financial institutions, credit reference agencies and regulatory bodies with whom such personal data is shared.

7. Retention

We have implemented robust IT management systems, such as One Viewpoint, to ensure the security of our data. These systems adhere to recognized standards, providing a comprehensive framework for safeguarding information and maintaining a secure operational environment to protect personal information from loss, misuse, alteration or destruction.

We will retain your personal data for as long as is necessary, and specifically in accordance with the table set out above, to provide the Services which you have requested from us.

It is our normal practice to retain documents relating to our engagement as prescribed in the local Bahrain regulations (which is in between five to ten years depending on the jurisdiction in which you are incorporated or registered) from the end of the relevant Service. However, we may need to retain some records for a longer period where this is required for us to be able to comply with our legal obligations.

We may also need to retain your personal data for a longer period where this is required in relation to legal claims, although this is rare.

Upon termination or expiry of the relevant period, we securely erase your personal data in accordance with the Bahrain Data Protection legislation.

In some circumstances we may anonymise your personal data so that it can no longer be associated with you, in which case we may use such information without further notice to you.

8. International Transfers

Your personal data may be shared within the Sovereign Group. This may include transferring your personal data to other Group offices.

We may also share your personal data with 3rd party service providers. If we do so, we will enter into appropriate contractual arrangements to oblige the entities in those countries to operate to appropriate data protection standards.

- These include Standard Contractual Clauses (SCCs) approved by the European Commission, which will be amended and applied accordingly to take into consideration the relevant requirements of the Bahrain Data Protection legislation, to ensure that those entities that operate in those countries maintain adequate and sufficient data protection standards expected within the EU/EEA.

In such cases, our service providers and suppliers are data processors and may only use the data in line with our instructions and not for any other purpose. This and other obligations are agreed in the data processing contract between us.

9. Your rights and how to complain

You have certain rights in relation to the processing of your Personal Data, including the below:

Right to be informed

We have an obligation to inform you when data is being processed; the purposes for which data is intended to be processed, and any other necessary information, depending on the circumstances of each case, in order to ensure the processing is fair.

Right to rectification

You have the right to make a written request to us to have your personal data rectified.

Right to erasure (commonly known as the right to be forgotten)

You have the right to make a written request to us to have personal data about you erased.

Right to object to processing

You have the right to object to the use of your personal data processing that you believe is causing material, moral or psychological damage to yourself or others.

Automated decision-making.

Where data processing is used to assess your performance, financial position, creditworthiness, behaviour, or reliability, you have the right to request that the processing is not wholly automated (ie that there is some human input into the decision making process).

Right to withdraw consent

You may give us notice at any time to withdraw consent for the processing of your personal data.

Right to lodge a complaint

If you believe your personal data is being processed in breach of the law then you have a right to complain to the Personal Data Protection Authority.

You can contact the Personal Data Protection Authority of Bahrain online at [Personal Data Protection Authority | Kingdom Of Bahrain \(pdp.gov.bh\)](https://pdp.gov.bh), or alternatively by emailing dp-team@moj.gov.bh

Or by telephone on (+973) 175 133 14. You can also visit the Personal Data Protection Authority at the following address : King Faisal Highway, Road Number 1703, P.O. Box 450, Manama, Kingdom of Bahrain

.How to exercise your rights

If you wish to exercise your rights, you may contact us using the details set out below within the section called 'How to contact us and our Data Protection Officer'. We may need to request specific information from you to confirm your identity before we can process your request. Once in receipt of this, we will process your request without undue delay and within one month. In some cases, such as with complex requests, it may take us longer than this and, if so, we will keep you updated.

10. How to contact us

If you wish to contact us in relation to this privacy notice or if you wish to exercise any of your rights outlined above, please contact:

dpo@Sovereigngroup.com

Changes to this privacy notice

Sovereign Trust Consultancy (Bahrain) keeps this privacy notice under regular review. We will inform you of any substantial change in how we process your personal data which will be updated on Sovereign's web page. This privacy policy was last updated on 28 January 2024.