

Sovereign Corporate & Trustee Services Limited

Privacy Notice for provision of trust and company administration 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 trust and company administration 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.

2. What Personal Data is

'Personal Data' means any information from which someone can be identified either directly or indirectly. For example, you can be identified by your name or an online identifier.

'Special Category Personal Data' is more sensitive Personal Data and includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purposes of uniquely identifying someone, data concerning physical or mental health or data concerning someone's sex life or sexual orientation, criminal conviction data which would cover information about offenders or suspected offenders in the context of criminal activity, allegations, investigations or proceedings.

'Criminal offence data' refers to personal data relating to criminal convictions and offences or related security measures. This covers information about offenders or suspected offenders in the context of criminal activity, allegations, investigations and proceedings.

3. Personal Data we collect

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

4. How we collect your Personal Data

We collect most of the Personal Data directly from you in person, by telephone, text or email and/or via our website.

However, we may also need to collect Personal Data from third parties such as:

- Introducers
- Appointed investment advisers and/or investment managers
- Intermediaries
- Courier and mail services
- Third Party Contractors and Service Providers
- Financial Entities and payment providers
- Investment houses
- Custodians
- Authorities and Regulators
- Any other person, be it natural or legal, with whom we liaise with for the provision of services.

5. Cookies

A cookie is a small text file which is placed onto your device (e.g computer, smartphone or other electronic device) when you use our website.

Our website uses cookies. For further information about cookies and how we use them, please see our [Cookie Notice](#).

6. Purposes, lawful bases and retention periods



| Categories of individuals | Categories of Personal Data | Purpose of Processing | Lawful Basis | Retention Period |
|--|--|---|--|---|
| <p>Existing clients</p> <p>Prospective clients</p> <p>Beneficiaries of trusts</p> <p>Authorised representatives of clients</p> | <p>Identity information: Name, surname, date of birth, contact details (email, address, etc), identification document, proof of address document, employment information, beneficiaries' details, tax residency, tax numbers</p> | <p>Onboarding: To verify the identity of clients and assess their suitability for services offered.</p> <p>Ongoing monitoring: To monitor client activity for compliance with HMRC supervisory requirements, including anti-money laundering (AML), terrorist/proliferation financing (CT/PF), and fraud prevention.</p> | <p>Legal obligation: Processing is necessary for compliance with legal obligations to which the retirement scheme administrator is subject, such as AML and CT/PF regulations</p> <p>Contractual necessity: Processing is necessary for the performance of a contract with the individual or to take steps at the request of the individual prior to entering into a contract (e.g., onboarding new clients).</p> <p>Legitimate interests: Processing is necessary to prevent fraud or ensure the security and integrity of transactions during the ordinary course of business.</p> | <p>Six years from the termination of the business relationship or after the end of the contractual relationship</p> |
| <p>Existing clients</p> <p>Prospective clients</p> <p>Beneficiaries of scheme members</p> <p>Authorised representatives of clients</p> | <p>Criminal Conduct Certificate or similar records or adverse media found online and on screening software</p> | <p>Ongoing monitoring of criminal conduct certificates, criminal records, and adverse media is necessary to identify and mitigate risks. By continuously monitoring for any criminal activities or adverse media to fulfil obligations to comply with regulations and sanctions guidelines, safeguarding the business's integrity and reputation.</p> | <p>Legal obligation: regulatory requirements or sanctions regulator guidelines may mandate ongoing monitoring of individuals to prevent financial crime, fraud, CT/PF or other illicit activities</p> <p>Legal obligation: HMRC guidance and legislation or sanctions guidelines may mandate ongoing monitoring of individuals to prevent financial crime, fraud, CT/PF or other illicit activities.</p> <p>Legitimate Interest: Protecting the business's reputation, and</p> | <p>Six years from the termination of the business relationship or after the end of the contractual relationship</p> |



| | | | | |
|---|---|--|--|--|
| | | | stakeholders' interests by identifying and mitigating risks associated with individuals is essential for its continued operation and sustainability. | |
| Existing clients Prospective clients | Marketing: Name, contact information (address, email, phone number), date of birth, | To communicate updates, changes, and news related to services offered To promote events, webinars, or educational resources related to services offered | Consent: For individuals who have explicitly opted in to receive marketing communications. | Personal data of existing clients Retained for the duration of the provision of services and for a period of six years from the termination of the business relationship or after the end of the contractual relationship. Personal data of prospective members: Retained for a reasonable period to follow up on inquiries and maintain communication until they are accepted as clients or services do not proceed. |

Where Personal Data is processed because it is necessary for the performance of a contract to which you are a party, we will be unable to provide our services without the required information.



7. Marketing

We would like to send you information about our products and services, events and news, which may be of interest to you. Where we have your consent or it is in our legitimate interest to do so, we may do this by email, telephone or social media.

You can unsubscribe at any time by:

- contacting us at marketing@sovereigngroup.com
- using the 'unsubscribe' link in emails.

You also have the right to object to your personal data being used for direct marketing purposes at any time.

For more information on how we use your personal data for marketing purposes, please see our [Marketing Privacy Notice](#).

8. Sharing your Personal Data

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

- Regulators and other Authorities
- The Sovereign Group Ltd staff and personnel, including Sovereign Trust (Mauritius) Limited, Sovereign Group Resources Limited and Sovereign Asset Management (Gibraltar)
- Sovereign Corporate & Trustee Services Limited's staff and personnel
- Introducers
- Intermediaries
- Third Party Contractors and Service Providers
- Screening software companies
- Financial Entities and payment providers
- Investment advisers and investment managers appointed on your plan
- Authorised entities appointed on your plan
- Custodians
- Any other person, be it natural or legal, with whom we liaise with for the administration of your trust or company.

9. Retention and Destruction of Data

We will retain your personal data for as long as is necessary to provide the services which you have requested from us.

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.

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

Your information will be securely stored on an internal storage system, both in hard copy and soft copy format.

We retain your personal data in accordance with the retention periods set out in the table above.

When the retention period expires, we will dispose of your personal data in a secure manner. This may involve shredding physical documents containing personal information and securely erasing digital files from our internal storage system.

We will also dispose of your personal data upon your request, unless it is necessary for us to continue holding the information for the provision of a service or legal obligation.

Example of Data Destruction:

Physical documents: Hard copies of your personal data are collected and destroyed offsite by a confidential and secure shredding service compliant with GDPR.

Digital files: Digital files containing your personal data will be securely erased from our internal storage system using industry-standard data wiping software, which ensures that the data cannot be recovered or accessed by unauthorized parties.

10. International Transfers

Your personal data may be shared within The Sovereign Group Ltd., 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 obligations.

These standards include the International Data Transfer Agreement and the International Data Transfer Addendum to the European Commission's Standard Contractual Clauses.

11. Your rights and how to complain.

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

- **Right to be informed**
You have the right to know what personal data we collect about you, how we use it, for what purpose and in accordance with which lawful basis, who we share it with and how long we keep it. We use our privacy notice to explain this.
- **Right of access** (commonly known as a "Subject Access Request")
You have the right to receive a copy of the Personal Data we hold about you.
- **Right to rectification**
You have the right to have any incomplete or inaccurate information we hold about you corrected.
- **Right to erasure** (commonly known as the right to be forgotten)
You have the right to ask us to delete your Personal Data. This is not an absolute right.
- **Right to object to processing**
You have the right to object to us processing your Personal Data. If you object to us using your Personal Data for marketing purposes, we will stop sending you marketing material.
- **Right to restrict processing**
You have the right to restrict our use of your Personal Data.

- **Right to portability**
You have the right to ask us to transfer your Personal Data to another party.
- **Automated decision-making.** You have the right not to be subject to a decision based solely on automated processing which will significantly affect you. We do not use automated decision-making.
- **Right to withdraw consent**
If you have provided your consent for us to process your Personal Data for a specific purpose, you have the right to withdraw your consent at any time. If you do withdraw your consent, we will no longer process your information for the purpose(s) you originally agreed to, unless we are permitted by law to do so.
- **Right to lodge a complaint**
You have the right to lodge a complaint with Information Commissioner's Office (ICO), if you are concerned about the way in which we are handling your Personal Data. The ICO can be contacted online at [Data protection and personal information complaints tool | ICO](#)

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.

12. How to contact us and our Data Protection Officer

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 our Data Protection Officer as follows:

Sovereign Corporate & Trustee Services Limited,
 Office 4, 3/F Coachworks Arcade, Northgate Street, Chester CH1 5UD
 Email address: ukcorporate@sovereigngroup.com
 Telephone number: +44 (0)1244 901350

13. Changes to this privacy notice

We may update this notice (and any supplemental privacy notice), from time to time as shown below. We will notify of the changes as when applicable.

| | |
|-------------------------|--|
| OWNER | Sovereign Corporate & Trustee Services Limited |
| APPROVER | Board of Directors |
| CLASSIFICATION | Internal Use Only |
| DATE OF ISSUE | June 2024 |
| ISSUE | v1.0 |
| REASON FOR ISSUE/UPDATE | First Issue |
| LAST REVIEW/UPDATE | |
| NEXT REVIEW | June 2025 |
| DISTRIBUTION | All Sovereign Employees |

| VERSION | AUTHOR | SUMMARY OF CHANGES | DATE |
|---------|-----------------|--------------------|-----------|
| 1.0 | Josephine Rocca | First Issue | June 2024 |
| | | | |
| | | | |