

# **Sovereign Trustee Services (Mauritius) Limited Privacy Notice for provision as Trust Service providers**

## **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 corporate administrative 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 relating to a data subject. A data subject is a natural person who is identified or identifiable.

'Special Category Data' is any information that reveals personal data relating to racial or ethnic origin, political opinion or adherence, religious or philosophical beliefs, membership of a trade union, physical or mental health or condition, sexual orientation, practices or preferences, genetic or biometric data that is uniquely identifying, commission or proceedings related to the commission of a criminal offense.

## **Personal Data we collect**

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

## **3. 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:

- Eligible introducers
- Legal Firms
- Other regulated institutions, for example, investment houses and banks.

#### **4. 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:

<b>Categories of individuals</b>	<b>Categories of Personal Data</b>	<b>Purpose of Processing</b>	<b>Lawful Basis</b>	<b>Retention Period</b>
<b>Client</b>	<b>Name, address, contact details, identification document, personal/work email address, Source of Wealth and Source of Funds including Curriculum Vitae</b>	<b>To onboard a client and provide trust and corporate services</b>	<b>Contract</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Client</b>	<b>Passport</b>	<b>To verify the identity of the client.</b>	<b>Contract</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Non-EU Client wishing to act as Director</b>	<b>Criminal Conduct Certificate</b>	<b>To carry out background checks which must be provided to Registrar of Companies and Financial Services Commission.</b>	<b>Legal Obligation</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Client</b>	<b>Name, address, email address, VAT number, identity number</b>	<b>To provide invoices</b>	<b>Contract</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Client</b>	<b>Name, address, email address</b>	<b>To conduct mandatory file reviews</b>	<b>Reporting obligations and Regulatory requirements</b>	<b>Seven (7) years from the termination of the business relationship</b>

<b>Client</b>	<b>Financial data (Bank account details, tax classification, statements, balances, transactions and receipts) including Source of Wealth and Source of Funds</b>	<b>To provide the requested services and for transaction monitoring and mandatory file reviews</b>	<b>Reporting obligations and Regulatory requirements</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Client</b>	<b>Financial data (Bank account details, tax classification, statements, balances, transactions and receipts)</b>	<b>To provide the requested services &amp; filing of tax documentation</b>	<b>Contract</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Client</b>	<b>Video recordings for certification purposes</b>	<b>To provide the requested services and for mandatory processing requirements</b>	<b>Regulatory obligations</b>	<b>Seven (7) years from the termination of the business relationship</b>
<b>Client</b>	<b>Name, job title/profession, personal/work email address, contact details, employer details &amp; company information</b>	<b>To send you newsletters and keep you updated with promotional activity</b>	<b>Consent</b>	<b>Seven (7) years from the termination of the business relationship</b>

**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.**

## 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. 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](mailto: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 purpose, please see our [Marketing Privacy Notice](#).

## 7. Sharing your Personal Data

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

Banks  
Mauritian Regulators  
Any other Regulators  
Lawyers  
Accountants  
Property Managers  
Other Sovereign entities

## 7. Retention

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.

As per Mauritian legislation, all documents should be retained 7 years post termination of contract.

The personal information would be retained either in hard copies or in soft copies. The hard copies would be archived with a contracting party whereby the personal information would be disposed post agreed timeline. The soft copies would be saved on Company's server which are protected by a robust cyber framework.

## **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 3<sup>rd</sup> part 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.

Personal data may only be transferred outside of Mauritius when the conditions for transfer are as set out in section 36 of the Data Protection Act

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 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.
- **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.

- **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 lodge a complaint**  
You have the right to lodge a complaint with the Data Protection Office, if you believe STML is infringing the data protection laws or you are concerned about the way in which we are handling your personal data.

The supervisory authority in the Republic of Mauritius is the Data Protection Office headed by the Data Protection Commissioner.

You can further contact details on their website. The address is Level 5, SICOM Tower, Wall Street, Ebene Cyber City, Ebene, Mauritius.

Telephone: 4600251

Email [dpo@govmu.org](mailto:dpo@govmu.org)

### **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 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:

H21 Home Scene Building, Healthscape • Forbach

Email address: [STMLDPO@sovereigngroup.com](mailto:STMLDPO@sovereigngroup.com)

Phone number: +230 2443210

## **11. Changes to this privacy notice**

12. We keep our privacy notice under regular review to make sure it is up to date and accurate. We will update this notice accordingly on our website.



