

# MTSDMLDP003 – Client Privacy Notice for provision of corporate directorship 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 administrator of foundations, corporate trustee or other corporate 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 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 administrator of foundations, corporate trustee or other corporate services. 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 or video call, text or email and/or via our website.

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

- Sovereign staff and Personnel
- Group staff and Personnel
- Introducers
- Intermediaries
- Courier and mail services
- Recruitment Agencies

- Third Party Contractors and Service Providers
- Financial Entities and payment providers
- Authorities and Regulators

## 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 here [Sovereign Group Marketing Privacy Notice - The Sovereign Group](#).

## 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:

- Where we need to comply with a legal obligation
- Where it is in our legitimate interests (or those of a 3<sup>rd</sup> party) to do so
- To confirm suitability for us to provide you with the requested services
- We may also use your data in the following situations, which are likely to be rare:
  - With your consent
  - Where we need to protect your vital interests (or someone else's)
  - Where it is needed in the public interest
  - Where it is requested of us by our Regulators and/or License providers



| <u>Categories of individuals</u> | <u>Categories of Personal Data</u>  | <u>Purpose of Processing</u>   | <u>Lawful Basis</u>                               | <u>Retention Period</u>  |
|----------------------------------|---|--|---|--|
| Client                           | Name, address, contact details, identification document, personal/work email address. Source of Wealth and Source of Funds including Curriculum Vitae | To onboard client and provide a service  | Contract  | Five (5) years from the termination of the business relationship |
| Client                           | Passport  | To onboard client and provide a services requested                                     | Contract  | Five (5) years from the termination of the business relationship |
| Client                           | Name, address, email address, VAT number, identity number   | For invoice purposes   | Contract  | Five (5) years from the termination of the business relationship |
| Client                           | Name, address, email address  | For ongoing mandatory file reviews   | Reporting obligations and Regulatory requirements | Five (5) years from the termination of the business relationship |
| Client                           | Financial data (Bank account details, tax classification, statements, balances, transactions and receipts)  | To provide the service requested and for transaction monitoring mandatory file reviews | Reporting obligations and Regulatory requirements | Ten (10) years from the termination of the business relationship |



|        |  |  |                        |  |
|--------|--|--|------------------------|--|
| Client | Financial data (Bank account details, tax classification, statements, balances, transactions and receipts)       | For providing the service & filing of tax documentation                    | Contract               | Ten (10) years from the termination of the business relationship |
| Client | Video recordings for certification purposes  | To provide the service requested and for mandatory processing requirements | Regulatory obligations | Five (5) years from the termination of the business relationship |
| Client | Name, job title/profession, personal/work email address, contact details, employer details & company information | To send you newsletters and keep you updated with promotional activity     | Contract               | Two (2) years from the termination of the business relationship  |

**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. 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:

- Regulators and other Authorities
- Sovereign staff and Personnel
- Group staff and Personnel
- Introducers
- Intermediaries
- Courier and mail services
- Recruitment Agencies
- Third Party Contractors and Service Providers
- Financial Entities and payment providers

## 8. 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 called View Point.

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

We will then dispose of said information, when and as is necessary, such information held on you if such is requested by yourself (unless this continues to remain necessarily held by Sovereign for the provision of a service).

## 9. 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 standards include Standard Contractual Clauses (“SCCs”) approved by the European Commission, which contractually oblige the entities in those countries to operate to the 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.

## 10. 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.
- **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 the relevant supervisory authority, if you are concerned about the way in which we are handling your Personal

Data. The supervisory authority in Malta is the IDPC who can be contacted online at:

Floor 2, Airways House, Triq Il-Kbira, Tas-Sliema SLM 1549  
[Home - IDPC](#) or [idpc.info@idpc.org.mt](mailto:idpc.info@idpc.org.mt)  
+356 2328 7100

### **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.

## **11. 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 Directors (Malta) Limited, Level 5 St Julians Business Centre, Elia Zammit Street,  
St Julians STJ 3153, Malta

[maltadpo@sovereigngroup.com](mailto:maltadpo@sovereigngroup.com)

+356 2122 8411

## **12. 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 where required by applicable law to do so.

Last modified **January 2024**

[ You can find previous versions of this notice here [\[hyperlink\].](#) ]