

Privacy Notice

This Privacy Notice sets out how personal data is collected, processed and disclosed by Carey (which consists of the entities set out in paragraph 6 below).

This Privacy Notice is addressed to any person from whom Carey collects personal data in the course of providing or preparing to provide its services where Carey is the controller of that data. This may include our clients and, where a client is not a natural person, the owners and controllers of those clients and their respective personnel.

We take privacy and security of your information seriously and will only use such personal information as set out in this Privacy Notice.

This Privacy Notice should be read in conjunction with the Administrator's main terms and conditions, privacy policy and any other relevant legal notices as provided on its website or elsewhere.

1 The personal data we collect and how we obtain it:

1.1 Your personal data comprises the following categories:

- 1.1.1 information obtained from identification documentation (including name, former name, contact details, address, nationality and national identity numbers (where applicable));
- 1.1.2 job details, employment history, income and personal wealth;
- 1.1.3 tax status and tax identification numbers;
- 1.1.4 information about source of wealth, personal assets, income and bank account details;
- 1.1.5 information about your family structure and dependents or beneficiaries;
- 1.1.6 in certain circumstances, the following special category data:
 - (a) data revealing your political opinions and affiliations to enable us to assess whether you are, or are connected to, a politically exposed person; and
 - (b) criminal data, including criminal records or information relating to alleged criminal activity.

1.2 We primarily collect your personal data from the following sources:

- 1.2.1 from information which you or your authorised representative gives to us, including but not limited to:
 - (a) information set out in agreements you enter into with us;
 - (b) such other forms and documents as we may request that are completed in relation to the administration/management of your interests;
 - (c) client due diligence documentation as part of our regulatory requirements; and
 - (d) any personal data provided by you by way of correspondence with us by phone, e-mail or otherwise, including when you subscribe to industry updates or publications or requesting marketing information;
- 1.2.2 personal data we receive from you or any thirdparty sources which may include:
 - (a) entities in which you or someone connected to you has an interest;
 - (b) your legal, financial and other advisors and service providers;
 - (c) other financial institutions who hold and process your personal data to satisfy their own regulatory requirements;
 - (d) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; [and]

information from other publicly available sources (eg company registries).

- (e) We may also collect and process your personal data in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

2 Why we collect your personal data:

Lawful grounds for processing:

- 2.1 We are entitled to hold and process your personal data on the following lawful grounds:
 - 2.1.1 the processing is necessary for our legitimate interests provided your interests and fundamental rights do not override those interests;
 - 2.1.2 where you are a natural person, the processing is necessary to comply with our respective contractual duties to you under the terms of any agreements we have entered into with you;
 - 2.1.3 in connection with our provision of services to you, to comply with your legal and regulatory obligations;
 - 2.1.4 (on exceptional occasions) where we have obtained your consent; and
 - 2.1.5 (on rare occasions) where it is needed in the public interest.

Some of the grounds for processing described above will overlap and there may be several grounds which justify our use of your personal data.

Inaccurate or Amended Information

- 2.2 Please let us know if any of your personal data (including correspondence details) changes as soon as possible. Failure to provide accurate information or to update changed information may have a detrimental impact upon the services we provide to you, including the suspension of those services. Failure to provide information where the same is required for anti-money laundering, pursuant to automatic exchange of information agreements, or other legal requirements means that we may no longer be able to act for you under the terms of any agreement we have entered into with you.

Purposes of processing

- 2.3 Pursuant to paragraph 2.1, we may process your personal data for the purposes set out below ("**Purposes**"). Those based wholly or partly on our legitimate interests are set out in paragraphs 2.1.1 to 2.3.6 inclusive):
 - 2.3.1 conducting credit reference checks;
 - 2.3.2 communicating with you as necessary in connection with your affairs including where we provide services to you or in relation to which you have a connection, including with respect to any entities we administer on your behalf or of which you are a director, employee, representative, agent or sub-contractor of such entity or any of its associated entities, or a shareholder (or any of its directors, officers, employees or beneficial owners) of such an entity;
 - 2.3.3 operating our IT systems, software and business applications;

- 2.3.4 supporting our IT and business applications support teams, accounting, legal, reporting, internal audit and risk management, administrative, transfer, document storage, record keeping and other related functions, including but not limited to processing personal data in connection with our clients;
- 2.3.5 monitoring and recording telephone and electronic communications and transactions:
 - (a) for quality, business analysis, training and related purposes in order to improve service delivery;
 - (b) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act); and
 - (c) to enforce or defend our rights, or through third parties to whom we each may delegate such responsibilities or rights in order to comply with a legal or regulatory obligations imposed on each of us;
- 2.3.6 disclosing your personal data (including identity and your interest in our clients) to any bank, financial institution or other third-party lender providing any form of facility, loan, finance or other form of credit or guarantee to that client;
- 2.3.7 detecting and preventing crime such as fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanction on an ongoing basis ("**Regulatory Assessments**");
- 2.3.8 facilitating our internal administration, and the internal administration of each of our clients and retaining your personal data as part of our Regulatory Assessments or future services entered into by you;
- 2.3.9 liaising with or reporting to any regulatory authority (including tax authorities) with whom we or our clients are either required to cooperate or report to, or with whom it decides or deems appropriate to cooperate, in relation to an investment, and which has jurisdiction over us or our clients or their investments in a third country without the same or similar data protection laws as Guernsey or any EU member state (a "**Third Country without Adequacy**");
- 2.3.10 communicating with our professional advisers for the purposes of obtaining professional advice;
- 2.3.11 conducting business analytics and diagnostics;

We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where these are required or permitted by law.

- 2.4 To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data then the processing of such data shall solely be for the purpose of

complying with any duty imposed on us or on our clients by an enactment including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation.

3 Sharing personal data

- 3.1 We or our clients with whom you are connected may share your personal data with group companies and third parties (including bank, financial institution or other third-party lenders, IT service providers, auditors and legal professionals) under the terms of any appropriate delegation or contractual arrangement. Those authorised third parties may, in turn, process your personal data abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism.
- 3.2 Data processing (as described above) may be undertaken by any entity in the Bailiwick of Guernsey or the EEA.
- 3.3 This means that the countries to which we transfer your data are deemed to provide an adequate level of protection for your personal information. However, if we do transfer your data to a third party located in a country outside the Bailiwick of Guernsey and the European Economic Area, we will ensure that your personal data receives an adequate level of protection and will put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the EU laws and the laws of the Bailiwick of Guernsey on data protection, including the use of model contractual safeguards. If you require further information about these protective measures, you can request it from the Company using the contact details in the "How to Contact Us" section below.

4 Retention of personal data

- 4.1 Your personal data will be retained for the longest of the following periods:
- 4.1.1 for us, our clients with whom you are connected and/or any authorised third parties to carry out the Purposes for which the data was collected or as long as is set out in any relevant agreement you enter into with us);
 - 4.1.2 in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
 - 4.1.3 any retention period that is required by data protection laws and any applicable laws or regulatory requirements.
- 4.2 We endeavour to store your personal data securely on our computer and/or manually in accordance with accepted market standards.
- 4.3 Whilst we have taken every reasonable care to ensure the implementation of appropriate technical and security measures, we cannot guarantee the security of your personal data over the internet, via email or via our websites nor do we accept, to the fullest extent permitted by law, any liability for any errors in data transmission, machine, software or operating error or any other cause.

5 Your rights

- 5.1 You have, under certain circumstances, the following rights in respect of personal data:
- 5.1.1 the right to access and port personal data;

- 5.1.2 the right to rectify personal data;
 - 5.1.3 the right to restrict the use of personal data;
 - 5.1.4 the right to request that personal data is erased;
 - 5.1.5 the right to object to processing of personal data; and
 - 5.1.6 where we or our clients have relied on consent to process the personal data, the right to withdraw consent at any time by contacting us via the contact details below.
- 5.2 You also have the right to lodge a complaint with the Guernsey Data Protection Authority or a supervisory authority in the EU member state of your usual residence or place of work or of the place of the alleged breach if you consider that the processing of your personal data carried out by us has breached data protection laws. You may also appeal to certain courts against (i) any failure of the Guernsey Data Protection Authority to give written notice of whether the complaint is either being investigated or not being investigated and where applicable, the progress and the outcome of the investigation and (ii) a determination of the Guernsey Data Protection Authority not to investigate the complaint or a determination that a controller or processor has not breached or is not likely to breach an operative provision in connection with the complaint.
- 5.3 In limited circumstances we may approach you for your written consent to allow us to process certain particularly sensitive data or to use data for another purpose. Where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact dataprotection@wearecarey.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

6 Identity of the data controllers and processors

For the purposes of this Privacy Notice, Carey data controllers and processors are:

Carey Commercial Limited
C.L. Directors Limited
C.L. Nominees Limited
C.L. Secretaries Limited
Carey Trustees Limited
Chalford Limited
CT Directors Limited
CT Nominees Limited
CT Secretaries Limited

Scholer Nominees Limited

7 How to contact us:

If you have any questions about our use of your personal data, our retention procedures or our security processes, please contact us at: dataprotection@wearecarey.com. You have the right to make a complaint at any time.

8 Changes to this Policy

This Privacy Notice is dated August 2019.

We reserve the right to amend this Privacy Notice at any time without notice, in which case the date of the policy will be revised.