

UNITED KINGDOM

Privacy Notice

January 2026



STONEHAGE  
FLEMING

NOW AND FOR FUTURE GENERATIONS

## PRIVACY NOTICE

This Privacy Notice explains how Stonehage Fleming Companies (collectively “us”, “we”, “our”) in the United Kingdom collect, use and disclose your personal data, and your rights in relation to this data.

### WHO WE ARE

The following Stonehage Fleming Companies may process your data in the United Kingdom:

- Stonehage Fleming Investment Management Limited, a regulated Financial Service Provider that renders discretionary investment management and advisory services.
- Stonehage Fleming Advisory Limited, a regulated Financial Service Provider that provides corporate finance services.
- Stonehage Fleming Wealth Planning Limited, a regulated Financial Service Provider that provides financial advice.
- Stonehage Fleming Financial Services Limited, a regulated Financial Service Provider that provides integrated planning and financial advice.
- Stonehage Fleming Law Limited, a regulated law firm that provides legal, tax and related advice.
- Exmoor Fiduciary Limited, which provides Director, Trustee and company secretarial services.
- Stonehage Fleming Dealing & Treasury Services (UK) Limited, a regulated Financial Service Provider that handles banking and investment administration, including cash management, deal execution and custody.

One or more of these Companies may process your data, as a data controller, based on the service(s) you require. Each of these Companies are subject to the Data Protection Act 2018, the United Kingdom General Data Protection Regulation, the Data (Use and Access) Act and the Privacy and Electronic Communications Regulations. All our Companies are registered with the United Kingdom Information Commissioner, also known as the ICO. Our Companies are located at 6 St James’s Square, London, SW1Y 4JU.

Our UK Data Protection Officer (UK DPO) is Mr. Cesare Milani. His contact details are:

Email: [ukdataprotectionofficer@stonehagefleming.com](mailto:ukdataprotectionofficer@stonehagefleming.com)

Telephone: +44 (0) 207 036 5000

Post: 6 St James’s Square, London, SW1Y 4JU, United Kingdom.

Our appointed representative in the European Union is Sturdon Holdings Luxembourg SARL. The Privacy Officer in Luxembourg for the appointed representative can be contacted using:

Email - [luxprivacyofficer@stonehagefleming.com](mailto:luxprivacyofficer@stonehagefleming.com)

Telephone - +352 27 44 73 00

If you are a natural person resident in South Africa or a Juristic Person resident in South Africa and are contracting with us or connected to an entity contracting with us then this privacy notice may apply to you, and the processing of your data may be subject to the requirements of the Protection of Personal Information Act No. 4 of 2013.

We may amend this Privacy Notice from time to time to reflect any changes in the way that we process your personal data. This Privacy Notice supersedes any previous version of this notice with which you may have been provided or had sight of before the stated date, as well as anything to the contrary contained in any agreement with us.

### YOUR RIGHTS

You have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.



- To require that we cease processing your personal data if the processing is causing you damage or distress.
- To require us not to send you marketing communications.
- To require us to correct the personal data we hold about you if it is incorrect.
- To require us to erase your personal data.
- To require us to restrict our data processing activities.
- To complain to us about how we are processing your data.
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about your rights under data protection legislation at [www.ico.org.uk](http://www.ico.org.uk)

If you have any questions about how we use your personal data, have a complaint, or you wish to exercise any of the rights set out above, please contact our UK Data Protection Officer using the above-mentioned email address.

If you are not satisfied with how we are processing your personal data after bringing any complaint to our attention, you can make a complaint to the Information Commissioner at [www.ico.org.uk](http://www.ico.org.uk)

## HOW WE COLLECT YOUR DATA

We may collect your personal data in several ways, for example:

- From the information you provide to us when you meet with one of our employees.
- When you communicate with us by telephone, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication.
- When you complete or we complete on your behalf client on-boarding, an application or other forms.
- From other companies in our Group, both within and outside the United Kingdom.
- From your agents, advisers, intermediaries, insurance companies, fund managers, investment managers and custodians of your assets.
- From publicly available sources or third parties where we need to conduct background checks about you.

## THE CATEGORIES OF THE DATA WE COLLECT

The type of information we collect will be informed by the service you require. We may collect the following categories of personal data about you:

- Your name, and contact information such as address, email address and telephone number.
- Your date of birth, tax identification number, passport number or national identity card details, country of domicile and your nationality.
- Information relating to you and your financial situation such as your industry and marketing segment, the services we offer which may be of interest, your net worth, income, expenditure, assets and liabilities, sources of wealth and your bank account details.
- Information about your knowledge and experience in the investment field.



- An understanding of your goals and objectives in connection with your wealth.
- Information about your employment, education, family or personal circumstances and interests.
- Information, some of which is collected daily, to assess whether you may represent a money laundering, terrorist financing or reputational risk to the Group. This includes whether you are a Politically Exposed Person, are involved in a high-risk business, have been arrested, charged or convicted of a crime, are on a sanctions list or expose us to tax, litigation, bribery or corruption risk.

## THE BASIS FOR PROCESSING YOUR DATA, HOW WE USE IT AND WITH WHOM WE SHARE IT

We may process your personal data without your specific consent because **it is necessary for the performance of a contract** to which you are a party, or to take steps at your request prior to entering into a contract.

- *In this respect, we **use** your personal data for the following:*
  - to prepare a proposal for you regarding the services we offer;
  - to comply with any regulatory, statutory or legal requirements;
  - to provide you with the services as set out in our Client Agreement or Terms of Engagement with you or as otherwise agreed with you from time to time;
  - to deal with any complaints or feedback you may have;
  - for any other purpose for which you provide us with your personal data.
- *In this respect, we may **share** your personal data with the following:*
  - intermediaries, insurance companies, banks, fund or investment managers and custodians of your assets;
  - your advisers and agents of other third parties;
  - third party administrators who we may engage to assist in delivering the services to you;
  - our advisers where it is necessary for us to obtain their advice or assistance;
  - other third parties such as intermediaries, insurance companies, fund managers or investment managers who we introduce to you;
  - companies or Trusts within our Group;
  - payment processors where we are making payments on your behalf;
  - our data storage providers.

We may also process your personal data because **it is necessary for our legitimate interests**.

- *In this respect, we may **use** your personal data for the following:*
  - to run, grow and develop our business;
  - to ensure a safe environment for our employees and visitors, including website visitors;
  - to provide client services;
  - to conduct market research and carry out business development activities;
  - to train our staff or monitor their performance;
  - for the administration and management of our business including carrying out internal group administrative functions and recovering money you owe to us;



- to seek advice and guidance on our rights and obligations, such as where we require our own legal advice;
  - to ensure we fulfil our obligations in relation to financial crime prevention;
  - to mitigate the risks we face.
- *In this respect, we may **share** your personal data with the following:*
    - our advisers, agents, settlors or protectors of trusts where it is necessary for us to obtain their advice or assistance;
    - with third parties and their advisers where those third parties are acquiring, or considering acquiring all or part of our business;
    - with regulators or authorities where we are required to do so.

If we rely on our (or another person's) legitimate interests for using your personal information, we will undertake a balancing test to ensure that our (or the other person's) legitimate interests are not outweighed by your personal interests or fundamental rights and freedoms which require protection.

We may also process your data for our **compliance with a legal obligation** which we are under.

- *In this respect, we may **use** your personal data:*
  - to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws, and where we are required to monitor, record or store telephone conversations.
- *In this respect, we may **share** your personal data with the following:*
  - our advisers where it is necessary for us to obtain their advice or assistance;
  - our auditors where it is necessary as part of their auditing functions;
  - with third parties who assist us in conducting background checks;
  - with relevant regulators, tax authorities, government bodies or law enforcement agencies where we are required to do so.

## SHARING OF INFORMATION

In sharing your personal data for the reasons set out elsewhere in this Privacy Notice, we may need to transfer it to other Group companies located in Switzerland, Israel, Jersey, Liechtenstein, Luxembourg, Guernsey, Malta, Isle of Man or Canada, which are countries which are viewed as providing an adequate level of protection for your personal data as is provided within the United Kingdom.

We may also share your personal data with Group companies located in the United States of America, South Africa, Monaco and Mauritius, which currently do not have laws which provide the same level of protection for your personal data as provided within the United Kingdom. We use Standard Contractual Clauses, as a safeguard, when making transfers to these countries or will do so with your explicit consent.

We may also share your personal data with other companies or service providers that we have engaged to assist us in providing services to you. These companies may be in jurisdictions which currently do not have laws which provide the same level of protection to your personal data as provided within the United Kingdom. Where we share your personal data with a company or service provider in a non-adequate jurisdiction we will do this using a safeguard, such as Standard Contractual Clauses, or with your explicit consent.

If you wish to receive details regarding the companies within the Group or other service providers which we



have engaged to assist in delivering services to you or to entities in respect of which you are connected or have an interest and with whom we have shared your information, please contact us using the following email address: [ukdataprotectionofficer@stonehagefleming.com](mailto:ukdataprotectionofficer@stonehagefleming.com)

## RETENTION OF YOUR DATA

We will retain your personal data in accordance with our Records Retention Policy. Please note that we may retain your information for a longer period where this is required by law or for the purposes of legal proceedings. Where we have provided advice relating to a pension transfer, pension conversion, pension opt-out or free-standing additional voluntary contribution, we will keep your personal data relevant to this indefinitely as we are required to do so by the Financial Conduct Authority.

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