

STONEHAGE FLEMING LAW LIMITED

Privacy Notice

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NOW AND FOR FUTURE GENERATIONS

PRIVACY NOTICE

This Privacy Notice explains how Stonehage Fleming Law Limited (“the Company”) collects, uses, and discloses your personal data, and your rights in relation to the personal data it holds.

In this Privacy Notice, “us”, “we” and “our” refers to the Company.

The Company is the data controller of your personal data and is subject to the Data Protection Act 2018 and the United Kingdom General Data Protection Regulation. Our Data Protection Officer (DPO) is Mr Cesare Milani. His contact details are: email: ukdataprotectionofficer@stonehagefleming.com, tel: +44 207 087 0136.

Our appointed representative in the European Union is Sturdon Holdings Luxembourg SARL. Our Data Protection Officer in Luxembourg is Mr Francois Moraux. His contact details are: email: luxprivacyofficer@stonehagefleming.com, tel: +352 2744 7341.

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 date stated below, 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 erase your personal data.
- To require us to restrict our data processing activities.
- 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.
- To require us to correct the personal data we hold about you if it is incorrect.

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

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact our Data Protection Officer.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner (www.ico.org.uk).

HOW WE COLLECT YOUR DATA

We may collect your personal data in a number of ways, for example:

- From the information you provide to us when you meet with us or with an employee or employees of one of our Stonehage Fleming Group companies or from a family member.



- When you communicate with us by telephone, video conference, fax, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication.
- When you or your agent complete or we complete on your behalf client on-boarding or application or other forms.
- From other companies in the Stonehage Fleming Group (the “Group”).
- From your agents, employees and advisers.
- From the trustee(s) of any trust in respect of which you are a settlor or a beneficiary or with which you are otherwise connected.
- From publicly available sources or from third parties where we need to conduct background checks about you.

THE CATEGORIES OF THE DATA WE COLLECT

We may collect the following categories of personal data about you:

- Your name, and contact information such as address, email address and telephone number, as well as your date of birth, social security identification number, passport number or national identity card details, country of domicile and 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 detail.
- 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.
- An understanding of your goals and objectives in connection with your wealth.
- Information about your employment, education, family, other personal circumstances, and interests.
- Information relating to your tax affairs including your tax status and tax identification number.
- Information concerning your medical health, where we have obtained your explicit consent.

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

Where we process your data other than with your consent

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 in order 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 scope of work for you regarding the advice we offer;
- to provide you with the advice as set out in our 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:*

- your advisers, agents and other third parties with your consent;
- third party service providers who we may engage on your behalf, for example, e-disclosure service providers and/or forensic data investigators;
- advisers or agents where it is necessary for us to obtain their advice or assistance, for example, foreign legal advisors and/or counsel or other specialists;
- registered agents;
- directors and or employees of companies, partnerships, other entities or the trustees of trusts in respect of which fiduciary and/or administrative services are provided, and in respect of which you are connected or have an interest;
- companies within our Group;
- the Office of the Public Guardian;
- relevant tax authorities;
- companies, partnerships, other entities or the trustees of trusts in respect of which our Group provides fiduciary and/or administrative services, and in respect of which you are connected or have an interest;
- 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 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.

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 for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering and revenue laws.

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 tax authorities, regulators or law enforcement agencies, where we are required to do so.

SHARING YOUR DATA

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 the same or a similarly 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 to your personal data as is provided within the United Kingdom. We will use Standard Contractual Clauses, as a safeguard, when making transfers to these countries or will do so with your explicit consent.

If you wish to receive details regarding the companies within the Group with which we have shared your information please contact us at ukdataprotectionofficer@stonehagefleming.com

RETENTION OF YOUR DATA

We will retain your data for as long as we reasonably believe it is appropriate to do so in your or our interests. Where we have collected client due diligence data as required by anti-money laundering (AML) regulations, we will retain that AML related personal data for five years after the termination of our relationship, unless we are required to retain this information by another law or for the purposes of court proceedings.

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