

STONEHAGE FLEMING LAW US

Privacy Notice

This Privacy Notice explains how Stonehage Fleming Law US (“the Firm”) collects, uses, and discloses your personal data, and your rights in relation to the personal data it holds for the purposes of the provision of its services. The Firm is Peter Rosenberg & Partners LLC trading as Stonehage Fleming Law US.

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

The Firm is the data controller of your personal data and is subject to Privacy Laws where these laws apply in the United States of America. The Firm is also subject to the European Union General Data Protection Regulation and similar privacy laws when providing services to clients in the European Union or a country (“adequate country”) viewed by the European Commission as providing adequate protection to your personal data, for example Jersey, the United Kingdom, Guernsey and the Isle of Man.

Our Appointed Representative and contact person in the United States of America is Mr. Jeffrey A. Hollowniczky. His contact details are: email usprivacyofficer@stonehagefleming.com - tel. +1 215 665 7270.

Our Appointed Representative in the European Union is Sturdon Holdings Luxembourg SARL. Our Appointed Representative in the United Kingdom is Stonehage Fleming Services Limited.

We may amend this Privacy Notice from time to time to reflect any changes in the way that we process your personal data, and we will notify you of any material changes to this Privacy Notice. By continuing to use our services, you agree that the terms of any amended Privacy Notice will apply to information and personal data previously collected or collected in the future. This Privacy Notice supersedes any previous version of this notice with which you may have been provided or read 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 direct marketing communications;
- To require us to erase your personal data;
- To require us to restrict our data processing activities;
- To require us to correct the personal data we hold about you if it is incorrect.

If you receive any services from us while a resident in any country in the European Economic Area or are resident in an adequate country then you will also be entitled 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.

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 Privacy Officer using any of the following: –

By post - 1700 Market Street, Suite 3010, Philadelphia, PA 19103, United States of America

By email - usprivacyofficer@stonehagefleming.com

By telephone - +1 215 665 7270



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 an employee of the Firm;
- When you communicate with us or when we communicate with you by telephone, fax, 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, our client on-boarding documents;
- From third parties, such as service providers that we use, demographic companies, marketing and advertising companies, third parties that provide us with information about you, and other third parties that we choose to collaborate or work with;
- From your agents, advisers and employees of firms with which you are associated; and
- From publicly available sources, or from third parties where we need to conduct background checks about you.

THE CATEGORIES OF DATA WE COLLECT FOR THE PURPOSES OF THE PROVISION OF OUR SERVICES

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

- Your name, date of birth, social security number, and passport or national identity card details;
- Country of birth, domicile, and citizenship;
- Contact information such as address, email address, and telephone number;
- Information about your employment, education, family, personal circumstances, and interests;
- Information relating to your tax affairs including tax identification number;
- Information relating to your financial situation such as your industry and marketing segment, the services we offer that may be of interest, your net worth, income, expenditure, assets and liabilities, sources of wealth, and bank account details;
- Information about your knowledge and experience in the investment field;
- Information regarding your goals and objectives in connection with your wealth;
- Information required to assess whether you may represent a money laundering, terrorist financing or reputational risk to the Firm. 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;
- Information concerning your health where you seek assistance in obtaining life insurance or medical coverage;
- Correspondence information, including information about your email or other written communications with us and information that you share in your emails and other written communications with us; and
- Voicemail message transcripts, including information about your call and information that you share when you call us on the phone or leave us a voicemail.



THE BASIS FOR PROCESSING YOUR DATA OTHER THAN WITH YOUR CONSENT, HOW WE USE THAT DATA AND WITH WHOM WE SHARE IT WITH

We may process your personal data because it is necessary for the performance of our duties under the terms of our engagement and the Rules of Professional Conduct governing the practice of law in Pennsylvania or any similar rules governing the practice of law in jurisdictions in which our attorneys are admitted to practice. We may use third parties or service providers to perform any of the actions or activities allowed under this Privacy Notice.

- In this respect, we may use your personal data for the following:
- To prepare preliminary information or a proposal for you regarding the services we offer;
- To provide you with the services as set out in our terms of engagement with you or as otherwise agreed with you from time to time;
- To respond to you when you correspond or communicate with us, or to otherwise deal with any complaints or feedback you may have; and
- 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 or agents or employees of firms with which you are associated;
- Registered agents;
- Companies, partnerships, other entities, or the trustees of trusts, and the directors and/or employees of such companies, partnerships, other entities, or trustees, in respect of which fiduciary and/or administrative services are provided, and in respect of which you are connected or have an interest;
- Our advisers where it is necessary for us to obtain their advice or assistance;
- Other third parties such as intermediaries, banks, insurance companies, fund managers, or investment managers to whom we may introduce you;
- The Stonehage Fleming Group;
- Payment processors, where we are making payments on your behalf; and
- 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:
- For the administration and management of our business, including to operate and improve upon our business and lawful business activities; to maintain our accounts and records, for research, to determine your satisfaction with our services; to detect and prevent fraud or misuse of our services; to mitigate the risks we face; to enforce, apply, or comply with any of our terms or policies, including but not limited to this Privacy Notice; for seeking advice on our rights and obligations, such as where we require our own legal advice; and for any other business purpose that is permitted by law.
- In this respect, we may share your personal data with the following:
- Our advisers or agents where it is necessary for us to obtain their advice or assistance; and
- With third parties to business transactions and their advisers, such as those we deal with in mergers, acquisitions, joint ventures, sales of assets, reorganizations, divestitures, dissolutions, bankruptcies, liquidations, or other types of business transactions. In these types of transactions, personal information may be shared, or transferred, and it may be used subsequently by a third party.

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:
- For legal, contractual and safety purposes, including to defend or protect us, our clients, you, or third parties, from harm or in legal proceedings; to protect our rights and security and the security of our clients, employees, and property; to respond to court orders, lawsuits, subpoenas, and government requests; to meet our compliance and regulatory obligations, such as compliance with anti-money laundering, tax and beneficial ownership applicable laws; to verify your identity or communications from you; to comply with contracts and other agreements to which we are a party; and to notify you of changes to our terms, policies or practices.
- 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;
- Third parties who assist us in conducting background checks about you, such as whether you are on sanctions lists; and
- Relevant government entities and regulators, tax authorities, law enforcement agencies where we are required to do so, and other third parties as required or allowed by applicable law.

We also may share personal information with third parties upon your request or with your consent, although we may not be able to accommodate all requests.

SECURITY AND RETENTION OF YOUR DATA

While we take steps to help protect the confidentiality and security of personal data that you provide to us, no method of transmission or storage is perfectly secure. We do not guarantee the security of your personal data. We may retain your personal data for as long as necessary for the purposes for which it was collected (which may be for a period of ten years or longer after the termination of our relationship with you), in order to provide you with services, to carry out our legitimate business interests, to meet our regulatory and legal obligations, and where otherwise required or permitted by law.

CHILDREN

We do not knowingly request or collect personal data from any person under 16 years of age without prior verifiable parental consent. If you believe that your child under the age of 16 has provided personal data to us without your consent, please email usprivacyofficer@stonehagefleming.com so that we can take steps to delete the personal data that she or he has provided as required in accordance with applicable law.

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