

PRIVACY POLICY

Hillberry Trust Company Limited (HTC) is committed to the principles of lawful, fair and transparent processing of personal data, and will only use your personal data in order to administer the product or services you are asking us to provide to you.

HTC is a 'Data Controller' as recognised by the current Data Protection legislation and is registered with the Information Commissioner in the Isle of Man.

Information on our processing activities and the rights that are provided to you under Data Protection legislation are noted below.

PROCESSING INFORMATION FAIRLY AND LAWFULLY

HTC processes your personal data only where:

- We have a legitimate interest to do so; or
- Where we need to perform the contract which has been entered into with you or are about to enter into;
- It is in the vital interests of you as the data subject; or
- You have given your explicit consent; or
- We are required to by our Regulators

We will not process personal data unless one of the above conditions apply.

WHAT DATA DO WE COLLECT?

HTC will only collect personal data that is essential to manage the product or services that you have asked us to provide and to comply with regulatory and statutory requirements. We believe in providing transparency regarding the data we are collecting and why we are collecting it so that you, as a data subject, can make informed decisions as to whether you want your data to be processed or not.

Personal data, or personal information, means any information about a living individual from which that person can be identified, directly or indirectly. We may collect different kinds of personal data about you when you interact with us, including via social media, email, telephone, post or in person. We may also receive this information from third parties (for example, a publicly available source or from someone who has recommended us to you and given us your contact details). We have grouped this information together as follows:

- Identity Data, such as your full name, maiden name, title, date of birth, gender and passport number
- Contact Data, such as your email address, telephone/fax number, address and other contact details
- *Enquiry Data, such as your enquiries about engaging us for services or job opportunities*
- *Correspondence Data, such as correspondence between us and you about an enquiry.*
- Relationship data, such as your relationship to and contact details of your dependants, your marital status
- Financial Data, such as financial information (including bank account details), personal wealth, source of funds etc –

- Marketing and Communications Data, such as your communications preferences and how you have responded to our marketing communications.

Please note that certain categories of data are classed as sensitive personal data. They include:

- Details of racial or ethnic origin;
- Political opinions;
- Religious or philosophical beliefs
- Trade Union Membership
- Health and Medical information
- Sex life or orientation
- Criminal Records (including alleged offences, spent convictions or court orders)

In the unlikely event that we may need to obtain information from you that may fall within any of the above special categories of data, we will always obtain your explicit consent before acquiring or processing such information.

WHY IS YOUR DATA PROCESSED?

We collect the above personal data for the purpose of:

- Creation and ongoing management of the product or structure relevant to your requirements;
- Dealing with any queries and/or complaints;
- Compliance with legal, regulatory and good governance obligations.

WHERE WE PROCESS AND STORE YOUR DATA

Your data will be processed and held securely in physical or electronic format within the offices and servers of HTC in the Isle of Man. We may also make your personal data available to other parties (individuals or group companies) who are providing relevant services for one of the above data processing purposes, such as professional or legal advisors, investment administrators or managers, banking institutions or for the preparation of accounts or other financial information, etc.

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Sharing

We are located in the Isle of Man; however you should be aware that we may, on occasion, be required to share your data with external providers outside of the Isle of Man or European Economic Area (“EEA”). In territories outside the Isle of Man or EEA, laws and practices relating to the protection of personal data may be weaker than those within the Isle of Man or EEA. We will take all reasonable steps to ensure that your personal data receives the same level of protection as it would had it stayed in the Isle of Man or EEA.

Your personal data may also be released to other external parties if authorised by you, or as required or permitted by law, or to comply with a judicial proceeding, court order, request from a regulator or any other legal process served on HTC.

OUR BASIS FOR PROCESSING YOUR DATA

The processing of your personal data is necessary in order for us to manage the trust, company or other products that we have been asked to provide services to.

We will proceed on the basis that, for the purposes set out above. You expressly consent to the processing (including the disclosures and transfers described above) of your personal data by the Trustees, Directors, or related third parties as set out above.

RETAINING INFORMATION

We will only retain your personal information during the lifetime of our business relationship with you plus any statutory retention period required.

HTC has in place a formal retention policy for the personal data information that we hold. All personal data held past these specified retention periods will be destroyed in accordance with this policy.

YOUR RIGHTS

As detailed within Data Protection Legislation, each Data Subject is afforded a number of rights. In accordance with these rights HTC will, upon request:

- Provide you with all of the data we hold about you, in a machine-readable format;
- Provide you with access to any or all the data that we hold about you, and provide you with details about why we have the data;
- Correct any information about you that you notify us is incorrect;
- Unless we are required to continue doing so by legislation, stop. Or where applicable, restrict the processing of data about you;
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- Remove all records about you from our systems, providing that there is not a legal reason to retain it. If there is a legal reason we will inform you of it, and provide you with details about how much longer we are required to retain your data for.

You can exercise these rights by contacting the Data Protection Officer at enquiries@hillberrytrust.com.

Please notify us as soon as possible if there has been a change in your details (e.g. if your personal circumstances, home address, etc. change).

MARKETING

HTC will only contact individuals who have consented to receiving marketing information, or requested direct communication for marketing purposes, and only in relation to our products and/or services.

Should you no longer wish to receive marketing communications from us:

You can reply to the individual who has contacted you requesting that no further marketing contact is made to you from HTC.

After this has occurred, HTC will not directly contact you in this regard again unless you provide a subsequent request to start receiving marketing material from us.

YOUR OBLIGATIONS

We need to be kept updated in regards to the information we hold about you to ensure it is accurate and up to date. Therefore, please notify us as soon as possible, if there has been a change in your details (e.g. if your personal circumstances, home address, tax residency change).