

PRIVACY NOTICE

1. How we use your personal data

We are committed to protecting your personal data which we collect from you. This can include your contact details (i.e. name, postal address, email address and telephone numbers) as well as additional personal data such as the country in which you are tax resident, tax identification number, passport number and personal financial information.

We will use your non-sensitive personal data to (i) register you as a new client, (ii) manage payments, (iii) collect and recover monies owed to us (iv) to manage our relationship with you, (v) administer trust and company structures including the reporting of information to relevant tax authorities, (vi) send you details of our goods and services.

Our legal grounds for processing your data are in relation to points (i) to (iv) above are for performance of a contract with you, in relation to (iii) and (vi) above, necessary for our legitimate interests to develop our products/services and grow our business and to recover monies owed and in relation to (v) above, is necessary to satisfy one or more legal obligations.

We will not share your details with third parties for marketing purposes except with your express consent.

2. Disclosure of your personal data

We may have to share your personal data with (i) service providers who provide IT and system administration support, (ii) professional advisors including lawyers, bankers, auditors and insurers (iii) HMRC and other regulatory authorities (iv) third parties to whom we sell, transfer or merge parts of our business or our assets and/or (v) to other

professionals for the purposes of the proper management of a trust or company structure or the proper management of assets held within those structures.

We require all of these third parties to whom we transfer your data to respect the security of your personal data and to treat it in accordance with the law. They are only allowed to process your personal data on our instructions.

3. International transfers

Some of our third party providers are businesses outside of the EEA in countries which do not always offer the same levels of protection for your personal data. We do our best to ensure a similar degree of security by ensuring that contracts, code of conduct or certification are in place which give your personal data the same protection it has within Europe. If we are not able to do so, we will request your explicit consent to the transfer and you can withdraw this consent at any time.

4. Data security

We have put in place security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We also limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know such data. They will only process your personal data on our instructions and are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breaches and in certain circumstances you can ask us to delete your data. See the section entitled 'your rights' below for more information.

We may anonymise your personal data (so that you

can no longer be identified from such data) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

5. Data retention

We will only keep your personal data for as long as is necessary to fulfil the purposes for which we collected it. We may retain your data to satisfy any legal, accounting, or reporting requirements so for example we need to keep certain information about you for 6 years after you cease to be a client for tax purposes.

You have the right to ask us to delete the personal data we hold about you in certain circumstances. See section 6 below.

6. Your rights

You are able to exercise certain rights in relation to your personal data that we process. These are set out in more detail at

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

In relation to a Subject Access Right request, you may request that we inform you of the data we hold about you and how we process it. We will not charge a fee for responding to this request unless your request is clearly unfounded, repetitive or excessive in which case we may charge a reasonable fee or decline to respond.

We will, in most cases, reply within one month of the date of the request unless your request is complex or you have made a large number of requests in which case we will notify you of any delay and will in any event reply within 3 months.

If you wish to make a Subject Access Request, please send the request to us at the above postal or email address marked for the attention of the Data Compliance Officer.

7. Keeping your data up to date

We have a duty to keep your personal data up to date and accurate so from time to time we will contact you to ask you to confirm that your personal data is still accurate and up to date.

If there are any changes to your personal data (such as a change of address) please let us know as soon as possible by writing to us at the above postal or email address.

8. Complaints

We are committed to protecting your personal data but if for some reason you are not happy with any aspect of how we collect and use your data, you have the right to complain. We should be grateful if you would contact us first if you do have a complaint so that we can try to resolve it for you. If you are not satisfied you can also complain to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk).