

Carey Olsen Corporate Services Privacy Notice

Introduction

This privacy notice describes how Carey Olsen collects, uses and shares the information you provide to us and the information we collect in the course of operating our businesses.

In this Notice, where we refer to "Carey Olsen" (or "we"/"us"/"our" or "CO Corporate Services"), we mean each of the relevant Carey Olsen Corporate Services entities set out at the end of this document as engaged by you.

Carey Olsen is an international group of businesses operating from nine international offices. Our offices include jurisdictions outside the European Economic Area

(EEA) which have not been deemed adequate for European Union data protection purposes (namely Bermuda, Singapore, the Cayman Islands, British Virgin Islands, Hong Kong and the Republic of South Africa).

We operate within the group of Carey Olsen entities which comprise the CO Corporate Services, Carey Olsen Group Services Limited (whose registered address is at 47 Esplanade, St Helier, Jersey JE1 0BD) and the law firm offices (the "Carey Olsen Group"). Information about the law firm entities within the Carey Olsen Group can be found at <https://www.careyolsen.com/privacy-policy>.

Each entity within the Carey Olsen Group (including CO Corporate Services) adheres to a set of global data protection standards (including a data sharing protocol).

References in this notice to "your information" are also to personal information that you provide to us or which we otherwise gather in the course of operating our business.

The information we collect

- We may collect and process various types of personal data about you, including:
- Name, address, email address, telephone number and other contact information;
- Date and place of birth;
- Nationality;
- Gender;
- Occupation;
- Copies of identity documents (such as passport, national ID card, driver's license, employee identification numbers);
- Utility bills and/or bank statements;
- Source of wealth;
- Tax residency;
- Details of shareholdings and other assets which are legally or beneficially owned by you;
- Details of directorships and information required to be held under applicable companies legislation;
- Details of people or organisations which may be connected to you (by family or otherwise);
- Your personal identification information (which may include your name and passport information personal data relating to claims, court cases and convictions, politically exposed person (PEP) status, personal data available in the

public domain and such other information as may be necessary for Carey Olsen to provide its services and to complete its CDD process and discharge its anti-money laundering and anti-criminal financing obligations);

- Technical data such as your Internet Protocol (IP) address, login data, browser plug-in types and versions, operating system and platform and any passwords and user names which you are required to create when accessing any of our password protected platform services. To learn more about our use of cookies or similar technology, please visit our cookies policy which can be found at [insert web page].
- Any other personal information that you may provide to us.

Please note this list is not exhaustive and that we may also collect and process other personal data to the extent that it is useful or necessary for the provision of our services.

Where we obtain your personal information

We collect your personal information from the following sources:

- personal information which you give to us directly, such as:
 - as part of such other forms and documents as we may request that are completed in relation to the administration/management of any of our services
 - information gathered through the processing of client due diligence (e.g. passports and proof of address etc.) carried out as part of our compliance with regulatory requirements
 - any personal information provided by way of correspondence with us by phone, e-mail or otherwise
- personal information we receive indirectly from third party sources, such as:
 - entities in which you or someone connected to you has an interest
 - your legal and/or financial advisors
 - financial institutions who hold and process your personal information
 - credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements
 - information that is publicly available over the internet
 - personal information received in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

How we use your information

At Carey Olsen we are committed to protecting and respecting your privacy. We provide corporate and other professional services to our clients and we use your personal data for those purposes. We may hold and process your personal data on the following lawful grounds:

- to perform a contract which we may have with you
- to comply with our legal and regulatory obligations
- for our legitimate business purposes

Your personal information may be processed for the purposes set out below. The Purposes based on our legitimate business interests are specifically defined under items (a) to (e) inclusive.

- a. to conduct administrative or operational processes within our business and / or our service providers;
- b. communicating with you as necessary in connection with our services;
- c. to send you marketing material (e.g., client briefings and updates);
- d. to invite you to events;

- e. provide you with personalised information;
- f. provide and improve our corporate services;
- g. to establish, exercise or defend the legal rights of Carey Olsen or for the purpose of legal proceedings;
- h. process and respond to requests, enquiries or complaints received from you or someone connected to you;
- i. to comply with legal or regulatory obligations imposed on us (including but not limited to AML/ATF/CFT obligations);
- j. collecting, processing, transferring and storing customer due diligence, source of funds information and verification data under applicable anti-money laundering and terrorist financing laws and regulations; and
- k. liaising with or reporting to any regulatory authority (including tax authorities) with whom we are either required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate in relation to the services we provide.

How and why we share your information

Within Carey Olsen

We share personal information within the Carey Olsen Group network. As a result, your personal information may be transferred to locations outside Europe as well as within it for the purposes described above as part of the Carey Olsen Group data sharing protocol. The Carey Olsen Group Privacy Policy can be accessed here <https://www.careyolsen.com/privacy-policy>.

Outside of Carey Olsen

We may also share your personal information outside Carey Olsen. This may include disclosures to:

- third party agents, suppliers or contractors, in connection with the processing of your personal information for the purposes described in this policy, which may include, but is not limited to:
 - Information Technology (IT) and communications service providers (including, without limitation, our software and / or platform providers in order to provide and maintain the performance of our services)
 - our own advisers such as auditors and accountants and any external legal advisors which we may instruct from time to time
- third parties relevant to the services that we provide, which may include, but is not limited to:
 - other professional service providers
 - regulators
 - law enforcement agencies
 - governmental institutions
 - tribunals and courts
- to the extent required by law, regulation or court order, for example if we are under a duty to disclose your personal information in order to comply with any legal obligation such as our anti money laundering and anti-criminal financing (AML/ATF/CFT) obligations

International transfers

Where we transfer your personal information outside the European Economic Area (the "EEA"), we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. This can be done in a number of different ways, for instance:

- the country to which we send the personal information may have been assessed by the European Commission as providing an "adequate" level of protection for personal data (this includes Jersey and Guernsey)
- the recipient may have signed a contract based on standard contractual clauses approved by the European Commission
- in limited circumstances, where applicable data protection legislation provides for an alternative transfer mechanism such as a derogation.
- in other circumstances, the law may permit us to otherwise transfer your personal information outside the EEA. In all cases, however, any transfer of your personal information will be compliant with applicable data protection law.

You can obtain more details of the protection given to your personal information when it is transferred outside Europe by contacting us using the details set out below.

Direct marketing

We may ask whether you wish to receive marketing from us and this will be presented to you as an option on the relevant application form or page on our website where necessary. We may also contact you by email or other means to inform you about other services or events which may be of interest to you.

You have the right at any time to stop us from contacting you for marketing purposes. If you wish to do so, please either unsubscribe by following the link at the bottom of the marketing email or by sending us an email to: website@careyolsen.com.

Retention of personal information and security

Your personal information will be retained for as long as required:

- for the purposes for which the personal information was collected
- in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations
- as required by data protection laws and any other applicable laws or regulatory requirements.

We will ensure that the personal information that we hold is subject to appropriate security measures.

Access to and control of your personal information

You have the following rights in respect of the personal information about you that we process:

- the right to access and port personal information
- the right to rectify personal information
- the right to restrict the use of personal information
- the right to request that personal information is erased
- the right to object to processing of personal information.

If you wish to exercise any of the rights set out above, please contact our group information security and data protection officer at dataprotection@careyolsen.com.

Inaccurate or amended information

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to provide services to you.

Questions and contact information

If you have any questions in relation to this notice please contact our group information security and data protection officer at one of the addresses listed below or by emailing dataprotection@careyolsen.com.

Changes to this policy

We may change this policy from time to time by updating this page. You should check this page from time to time to ensure you are happy with any changes. We last updated this policy on 2 March 2021.

Carey Olsen Corporate Services entities

- Carey Olsen Services Bermuda Limited of Rosebank Centre, 5th Floor, 11 Bermudiana Road, Pembroke HM08, Bermuda;
- CO Services (BVI) Ltd. and Carey Olsen Authorised Representatives Limited of Rodus Building, P.O. Box 3093, Road Town, Tortola, VG1110, British Virgin Islands;
- Carey Olsen Services Cayman Limited of Willow House, Cricket Square, P.O. Box 10008, Grand Cayman, KY1-1001, Cayman Islands;
- Carey Olsen Client Services (Guernsey) Limited of Carey House, Les Banques, St Peter Port, Guernsey GY1 4BZ; and
- Carey Olsen Corporate Finance Limited, Carey Olsen Corporate Services Jersey Limited, Carey Olsen Executors Limited, Carey Olsen Trustees Jersey Limited, Carey Olsen Nominees Jersey Limited and Verona Services Limited of 47 Esplanade, St Helier, Jersey JE1 0BD.