

## Carey Olsen 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 while operating our businesses.

In this notice, where we refer to "Carey Olsen" (or "we"/"us"/"our"), we mean each of the Carey Olsen entities set out at the end of this notice, each of our international affiliates and the companies and other entities which are associated with us.

Carey Olsen is an international law firm operating in ten 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, British Virgin Islands, the Cayman Islands, Hong Kong SAR, Singapore, and the Republic of South Africa). However, please note that Carey Olsen operates global data protection policies, and those offices are required to meet the same standard as our other offices. Details of the Carey Olsen entities are provided at the end of this privacy policy.

We may collect information from you through your use of this website, when you request information from us or engage with our legal or other services, or because of your relationship with one or more of our lawyers or otherwise during our business.

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

### The information we collect

We may collect various types of personal data about you, including:

- Your personal identification information, which may include your name and passport information, your IP address and 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 Customer Due Diligence ("CDD") process and discharge its Anti-money laundering/Countering the Financing of Terrorism/Proliferation Financing ("AML/CFT/PF") obligations;
- Your contact information, which may include postal address and e-mail address and your home and mobile telephone numbers
- Your family relationships, which may include your marital status, the identity of your spouse and the number of children that you have
- Your professional and employment information, which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold
- Financial information, sources of wealth and your assets, which may include details of your assets, sources of wealth, shareholdings and your beneficial interest in assets, your bank details, and your credit history
- Information about client matters which may include a wide range of personal information, such as employment, health, family issues and relationships, and regulatory status

- Where we are instructed to act in a criminal law matter, we may hold and process information about criminal offences and allegations as part of the services we provide
- We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship
- If you apply for a position with us, we may collect personal information relating to your past employment, professional qualifications and education, your nationality and immigration/residential status, opinions from third parties about you (such as references) and other details about you which may be gathered during the recruitment process. We may also review publicly available information about you on your social media accounts.

## Where we obtain your personal information

We collect your personal information from the following sources:

- Personal information which you give to us, such as:
  - Forms and documents we may request be completed in relation to the administration/management of any of our services
  - Information gathered through client due diligence carried out as part of our compliance with regulatory requirements; and
  - Any personal information provided by way of correspondence with us by phone, e-mail or otherwise.
- Personal information we receive from third party sources, such as:
  - Our clients: in connection with matters upon which we are or may be instructed (for example where you are a counterparty to a transaction or an employee of one of our clients or where you are a witness in a dispute resolution matter)
  - 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
  - Personal information received while dealing with advisors, regulators, official authorities, and service providers by whom you are employed or engaged or for whom you act.

## Information that we collect through our website

You are not required to provide any personal information on the public areas of our website; however, you may choose to do so by completing any of the forms which are included on the following pages:

- Homepage
- Careers
- Briefings
- Contact us.

In addition to the information you knowingly provide, Carey Olsen collects the domain names and IP addresses of its visitors, along with usage statistics, analytics and browsing history. This data is used to promote our services. Please see our cookies policy for more details about this. You may also provide us with personal information if you contact us by email, telephone, or letter.

## How we use your information

At Carey Olsen we are committed to protecting and respecting your privacy. We provide legal, corporate, and other professional services to our clients and we use your personal data for those purposes. Normally the purposes for which we use your personal data will be clear when we collect that data. We will not use your personal data for purposes that are not clear when we collect that data and will only use your personal information to:

- Conduct administrative or operational processes within our business
- Provide and improve our legal and other services
- Compile anonymous statistics, for example website usage statistics
- Perform a contract which we may have with you
- Comply with our legal and regulatory obligations
- To establish, exercise or defend the legal rights of Carey Olsen or for the purpose of legal proceedings
- Process and respond to requests, enquiries or complaints received from you or someone connected to you
- Send you marketing material (e.g., client briefings and legal updates)
- Provide you with personalised content
- Invite you to events
- For other legitimate business purposes
- To review and process your application should you apply for a position with us.

## How and why, we share your information

### Within Carey Olsen

We share personal information within Carey Olsen.

As a result, your personal information may be transferred to locations outside Europe as well as within it for the purposes described above.

### 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:
  - IT and communications service providers; and
  - 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 legal and other services that we provide, which may include, but is not limited to:
  - Counterparties to transactions or litigation (including law firms acting for other parties);
  - 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 to comply with any legal obligation such as our AML/CFT obligations
- we may disclose your personal information for the purposes of seeking references and confirmation of the details which you have provided should you apply for a position with us.

## 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 several different ways, for instance:

- The country to which we send the personal information may have been assessed by the European Commission ("EC") 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 EC.

In other circumstances, the law may permit us to 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 or contact [website@careyolsen.com](mailto: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
- 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.

You also have the right to lodge a complaint about the processing of your personal information either with us, with the Office of the Information Commissioner in Jersey (<https://oicjersey.org>); The Office of the Data Protection Authority in Guernsey (<https://odpa.gg>); the Information Commissioners Office in the UK (<https://ico.org.uk>); or the data protection authority in the EU member state of your usual residence or place of work.

Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time.

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](mailto: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](mailto: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 6 October 2023.

## Carey Olsen entities

- Carey Olsen Bermuda Limited, of Rosebank Centre, 5th Floor, 11 Bermudiana Road, Pembroke HM 08, Bermuda, a limited liability company incorporated in Bermuda, approved, and recognised under the Bermuda Bar (Professional Companies) Rules 2009, carrying on Bermuda legal services ("Carey Olsen Bermuda")
- Carey Olsen (BVI) L.P., of Rodus Building, P.O. Box 3093, Road Town, Tortola, VG1110, British Virgin Islands, a British Virgin Islands limited partnership carrying on BVI legal services ("Carey Olsen BVI")
- Carey Olsen Cayman Limited, of Willow House, Cricket Square, P.O. Box 10008, Grand Cayman, KY1-1001, Cayman Islands, a body corporate recognised under the Legal Practitioners (Incorporated Practice) Regulations, 2006 (as revised) of the Cayman Islands, carrying on Cayman Islands legal services, ("Carey Olsen Cayman")
- the Guernsey limited liability partnership known as Carey Olsen (Guernsey) LLP of Carey House, Les Banques, St Peter Port, Guernsey GY1 4BZ, carrying on Guernsey, Alderney, and Sark legal services (the "Guernsey Partnership")
- the Hong Kong Special Administrative Region of the People's Republic of China ("Hong Kong SAR") limited liability partnership known as Carey Olsen Hong Kong LLP of Suite 3610-13 Jardine House, 1 Connaught Place, Hong Kong SAR, carrying on BVI and Cayman legal services (the "Hong Kong Partnership")
- Carey Olsen Jersey LLP, registered as a limited liability partnership in Jersey with registered number 80, of 47 Esplanade, St Helier, Jersey JE1 0BD, carrying on Jersey legal services (the "Jersey Partnership")
- the limited liability partnership known as Carey Olsen LLP of Forum St. Paul's, 33 Gutter Lane, London, EC2V 8AS carrying on Jersey, Guernsey, Cayman Islands and BVI legal services (the "London Partnership")
- the Singapore limited liability partnership known as Carey Olsen Singapore LLP of 10 Collyer Quay #29-10, Ocean Financial Centre, Singapore 049315, registered in Singapore (registration number T15LL1127K) with limited liability and carrying on BVI and Cayman Islands legal services (the "Singapore Partnership")
- Carey Olsen South Africa (PTY) Limited of Protea Place, 40 Dreyer Street, Claremont, Cape Town, 7708, South Africa.