

PRIVACY NOTICE

JANUARY 2019

Appleby Global Services Holdings Limited and its subsidiaries (**AGS**) are committed to being responsible custodians of the information you provide to us and the information we collect in the course of operating our business and providing administration, reporting and fiduciary services.

Appleby Global Services Holdings Limited comprises: Appleby Global Corporate Services (Bermuda) Ltd, Appleby Global Trust Services (Bermuda) Ltd, Appleby Global Listing Services (Bermuda) Ltd, Appleby Global Services Holdings (Bermuda) Ltd, Appleby Global Services (Cayman) Limited, Appleby Global Services (Hong Kong) Limited, Appleby Global Services (IOM) Limited, Appleby Global Services (Jersey) Limited, Appleby Global Central Services Limited, Appleby Global Services Finance Limited, (**AGS Entities**).

This Privacy Notice sets out how AGS as a data controller (and the AGS Entities insofar as they are joint data controllers) may collect, use and share information in relation to the provision of the Services, and describes:

- The types of information, including personal information, we may collect;
- How we may use and share the information we collect;
- Legal grounds for using personal information;
- The measures we have in place to protect and safely store the information we collect;
- Retention of the information we collect;
- Your choices and rights in respect of the information we hold;
- How to contact us;
- Complaints; and
- Changes to this privacy policy

The types of information, including personal information, we may collect

We collect your personal information when you provide it to us. "Personal Information" is any information that can be used to identify you or that we can link to you as an individual and may include:

- Full name, date of birth, passport, driving licence or other photographic identity details;
- Company or organisation details;
- Contact information including postal address, email address and telephone number(s);
- Demographic information such as postcode, preferences and interests;
- Information pertinent to fulfilling our legal services on an individual's or organisation's behalf; and
- Information we collect automatically through cookies and similar tracking technologies through our website, mobile applications or other online services.

We may also collect, store and use the following "special categories" of more sensitive personal information including:

- Racial or ethnic origin;
- Political opinions, religious or philosophical beliefs;

- Trade union membership;
- Data concerning physical or mental health or disabilities;
- Genetic data or biometric data;
- Marital or family status; or
- Data concerning a natural person's sex life or sexual orientation.

Personal Information you provide to us voluntarily

We may also collect other information that you voluntarily provide to us, including when you communicate with us via email, post, telephone or other channels; when you sign up for or request that we send you our e-alerts, or other marketing materials; when you submit an application for an employment position with us; when you sign up for an event; and when you respond to our communications or requests for information.

Information we may collect from third party sources

We may receive information about you from other sources, including third parties and publically available information that help us: update, expand, and analyse our records; identify new customers or prevent or detect fraud. We may also receive information about you from social media platforms, including but not limited to, when you interact with us on those platforms or access our social media content. Please note that the information we may receive from those third party sites is governed by the privacy settings, policies, and/or procedures of the applicable platform, and we strongly encourage you to review them before submitting any information to them.

How we may use and share the information we collect

We may use the information we collect:

- To respond to your enquiries;
- To provide you with administration, reporting and fiduciary services;
- To send you e-alerts and other relevant updates, marketing communications and other information or materials that may be of interest to you or which you have expressed an interest in receiving;
- To maintain our list of contacts;
- For AGS's business purposes, including improving the provision of our services, data analysis; submitting invoices; detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement;
- To assess the effectiveness of our events, promotional campaigns and publications;
- To evaluate and recruit personnel; and
- As we believe reasonably necessary or appropriate to: comply with our legal obligations; respond to legal process or requests for information issued by government authorities or other third parties; or protect your, our, or others' rights.

How we may share the information we collect

AGS is a provider of administration, reporting and fiduciary services. Our offices and business entities share information with each other for business purposes such as billing, internal administration, promoting our events and services, and providing you or your organisation with administration, reporting and fiduciary services. We do not sell, rent, or otherwise share any information with unaffiliated entities except as expressly described in this Privacy Notice or with your prior permission. We may share anonymised information that does not reasonably identify you or your organisation only as permitted by applicable law.

We may also share information we collect with:

- Employees of AGS but their use shall be limited to the performance of their duties and in line with the reason for processing. Our employees are required to keep that information confidential and are not permitted to use it for any purposes other than to provide administration, reporting and fiduciary services, to deal with requests which are submitted to us or for the purposes of facilitating our use of that information in accordance with this Privacy Notice.
- Third-party service providers engaged by us to perform services on our behalf, such as web-hosting companies, information technology providers, analytics providers, marketing and communications services and event hosting services.
- Law enforcement, courts or tribunals, other government or competent authorities, or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us; as provided for under contract; or as we deem reasonably necessary to provide our administration, reporting and fiduciary services. In these circumstances, we take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organisation, unless giving prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- Service providers, advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged or amalgamated with another company or we sell, liquidate, or transfer all or a portion of our assets.

Legal grounds for using personal information

We rely on the following legal grounds to process personal information, namely:

- Performance of a contract – We may need to collect and use personal information to enter into a contract with you or to perform a contract that you have entered into with us. For example, when you engage AGS to provide administration, reporting and fiduciary services we will use your personal information to respond to provide you with such services.
- Legal obligation – We may need to collect and use personal information to comply with legal obligations to which AGS is subject. This includes undertaking client due diligence and background checks (known as “KYC” or “know your client” checks) as well as all other anti-money laundering, anti-bribery, sanctions or other legal obligations.

- Legitimate interests – We may use your personal information for our legitimate interests to provide administration, reporting and fiduciary services and to improve our services. Consistent with our legitimate interests and any choices that we offer or consents that may be required under applicable laws, we may use personal information for our marketing purposes and other technical information as described in this Privacy Notice.

Measures we take to protect and safely store the information we collect

AGS is a provider of administration, reporting and fiduciary services and we may store or process the information we collect in jurisdictions where we or our service providers have facilities, including but not limited to Cayman Islands, Hong Kong, Isle of Man and Jersey. There is an adequacy decision by the European Commission (“EC”) in respect of Jersey and the Isle of Man so these jurisdictions are considered to provide an adequate level of protection for your personal information in accordance with European Union standards. This means that the remaining jurisdictions to which we transfer your data are not deemed to provide an adequate level of protection for your personal information, or have not yet been assessed for such purposes by the EC.

However, to ensure that your personal information does receive an adequate level of protection we have put in place standard data protection clauses with all members of AGS or service providers with whom we may share information to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the laws on data protection within those jurisdictions. If you require further information about this protective measure or to obtain a copy, you can contact us via our Contact Us page.

In addition we deploy administrative, technical, and physical safeguards designed to comply with applicable legal requirements and safeguard the information that we collect. This includes, when required or appropriate and feasible, obtaining written assurances from third parties that may access your data that they will protect the data with safeguards designed to provide a level of protection equivalent to that adopted by AGS.

However, no information system can be 100% secure. So, we cannot guarantee the absolute security of your information. Moreover, we are not responsible for the security of information you transmit to us over networks that we do not control, including the Internet and wireless networks.

Retention of the information we collect

We retain the information we collect for no longer than is reasonably necessary to fulfil the purposes for which we collect the information and to comply with our legal obligations.

Your choices and rights

If you no longer wish to receive marketing communications from us, you can let us know via our Contact Us page. The electronic marketing communications we send you also contain opt-out mechanisms that allow you to opt-out from receiving those communications, update your contact information or change your preferences at any time. We will honour your choice and refrain from sending you such announcements. You may also opt back in to receive those communications at any time.

You have a number of rights in relation to the information that we hold about you. These rights include:

- the right to access information we hold about you and to obtain information about how we process it;

- in some circumstances, the right to receive certain information you have provided to us in an electronic format and / or request that we transmit it to a third party;
- the right to request that we rectify your information if it is inaccurate or incomplete;
- in some circumstances, the right to request that we erase your information. We may continue to retain your information if we are entitled or legally required to retain it;
- the right to request that we restrict our processing of your information in some circumstances. There may be situations where you object to, or ask us to restrict, our processing of your information but we are entitled to continue processing your information and / or to refuse that request.

You can exercise your rights by contacting us using the details set out below. As an individual you also have a right to complain to the data protection regulator in the country where you live or work (see below).

If you would like to discuss or exercise the rights you may have, you can contact us via our Contact Us page.

How to contact us

We welcome your enquiries and comments. But please note that if you are not a client, we may not be able to treat the information you send us as confidential or privileged. If you wish to contact us regarding administration, reporting and fiduciary services or other services, please contact one of our offices near you. You can find a list of our offices on our main website at www.ags-global.com

If you would like to contact us with questions about our privacy or data protection practices, please send us an email via our Contact Us page or by writing to:

Mr Robert Woods, Privacy Officer
GDPR@applebyglobal.com

Updates to Personal Data

AGS will use reasonable efforts to keep your personal information up to date. However, you will need to notify AGS without delay in the event of any change in your personal circumstances, or those of others mentioned above, so that we can keep the information up to date. You should do this through your usual AGS contact or via the Contact Us page.

Complaints

We are committed to working with you to obtain a fair resolution of any complaint or concern about your privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you may have the right to complain to the data protection authority/regulator, as applicable, in your jurisdiction. We have set out below the contact details for the relevant authority/regulator in each AGS jurisdiction:

Bermuda	Department of ICT Policy and Innovation Government Administration Building, 3 rd Floor 30 Parliament Street Hamilton HM12 Telephone: +441 294 2774 Email: ictpolicy@gov.bm
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Cayman Islands	Information Commissioner's Office PO Box 2252 Grand Cayman, KY1-1107 Cayman Islands Telephone: +1 345 946 6283 Email: info@ombudsman.ky
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Hong Kong	Privacy Commissioner for Personal Data 12/F, Sunlight Tower 248 Queen's Road East Wanchai, Hong Kong Telephone: +852 2827 2827 Email: enquiry@pcpd.org.hk
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Isle of Man	The Information Commissioner First Floor, Prospect House Prospect Hill Douglas Isle of Man IM1 1ET Telephone: +44 1624 693260 Email: ask@inforights.im
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Jersey	The Office of the Information Commissioner Brunel House Old Street St Helier Jersey JE2 3RG Telephone: +44 1534 716530 Email: enquiries@oicjersey.org
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Changes to this Privacy Notice

We may update this Privacy Notice from time to time and we encourage you to review this page periodically. If we make any material changes in the way we collect, use, and/or share the personal information that you have provided, we will notify you by posting notice of the changes in a clear and conspicuous manner on the AGS website www.global-ags.com.

