



Document Description & Summary

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Author	Carey Cooper
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Version	Date	Description of change	Reviewer
1.0	16/05/2024	Published	Carey Cooper
1.1	21/10/2025	Annual Review	Kevin Winton
1.2	05/12/2025	Comprehensive GDPR, PIPL, ADGM DPR, US state privacy law Enhancement - Added detailed cookie inventory, third-party provider information, international data transfer details, granular consent mechanisms, profiling disclosures, supervisory authority information, and enhanced user rights sections	Kevin Winton

TABLE OF CONTENTS

1.	Policy Statement	4
2.	Data Controller Information	4
3.	Distribution	4
4.	Business Objectives	5
5.	Impact Statement	5
6.	Responsibilities	5
7.	Scope	5
8.	Introduction	6
9.	What are Cookies	6
10.	Types of Cookies by Duration	6
11.	First Party vs Third-Party Cookies	6
12.	Types of Cookies We Use	6
13.	Detailed Cookie Inventory	7
14.	Third-Party Cookie Providers	11
15.	International Data Transfers	12
16.	Consent and Cookie Preference Management	20
17.	Consent Requirements	21
18.	Managing Cookies Through Browser Settings	21
19.	Do Not Track (DNT) Signals	22
20.	Consequences of Refusing Cookies	22
21.	Essential Cookies Only	22
22.	Your Rights Under GDPR	22
23.	Right of Access	22
24.	Right to Rectification	22
25.	Right to Erasure ('Right to be Forgotten')	22
26.	Right to Restriction of Processing	23
27.	Right to Object	23
28.	Right to Data Portability	23
29.	Right to Withdraw Consent	23
30.	Right to Lodge a Complaint	23
31.	Exercising Your Rights	23
32.	Automated Decision-Making and Profiling	24

33. **What is Profiling** 24

34. **Scope of Profiling** 24

35. **Your Rights Regarding Profiling** 24

36. **Children's Privacy** 24

37. **Cookie Refresh and Consent Expiry** 24

38. **Changes to this Policy** 25

39. **Contact Information** 25

40. **Policy Enforcement** 25

41. **Compliance Monitoring** 26

1. **Policy Statement**

The Appleby Information Security Management Forum (**ISMF**) provides governance for all information security matters both logical (electronic) and physical for Appleby Global Group LLC (**Appleby**). The ISMF Committee incorporates Board representation which includes, but is not limited to, the Group Managing Partner (**GMP**), and the Chief Technology Officer (**CTO**).

This document summarises the standards for the use of cookies and similar tracking technologies on Appleby's websites and applications in accordance with industry good practice for the use of personal devices to process company information with specific consideration to the General Data Protection Regulation (**GDPR**), the Abu Dhabi Global Market Data Protection Regulations 2021 (ADGM DPR), EU ePrivacy Directive, China's Personal Information Protection Law (**PIPL**), the California Consumer Privacy Act as amended by the California Privacy Rights Act (CCPA/CPRA), and applicable local data protection laws across our global jurisdictions. This Policy supports, and is used in conjunction with, the Appleby Information Security (GIS) Policy, ISMS-02.

The overall purpose of this Policy is to ensure transparency in our use of cookies, obtain valid user consent where required, and protect both client and user privacy in accordance with applicable regulations and industry best practices across all jurisdictions where Appleby operates.

In the event of any conflict between this Policy and another that provides for administrative security procedures, this Policy and related procedures shall take precedence. Any exception to a policy or procedure set forth in this Policy must be authorised in writing by the CTO.

2. **Data Controller Information**

Legal Entity: Appleby Global Group LLC

Registered Office: 33-37 Athol Street, Douglas, IM1 1LB

Company Registration: 109836C

Data Protection Officer: Carey Cooper

Email: dpo@global-ags.com

For China Operations: Shanghai and Shenzhen offices operate under separate data protection requirements.

Contact: Carey Cooper

Email: dpo@global-ags.com

3. **Distribution**

This Policy is publicly available on all Appleby websites (including the .cn domain for mainland China users) and applies to all users accessing our online services. It is also distributed to:

- All Appleby partners, employees, and contractors
 - Website administrators and marketing teams
 - Third-party service providers handling cookie-related data
- A Chinese-language version of this policy is available on the .cn domain for mainland China users as required by PIPL.

4. **Business Objectives**

The following business objectives are met by this Policy:

- Ensuring regulatory compliance with GDPR, ePrivacy Directive, China PIPL, ADGM Data Protection Regulations 2021, US state privacy laws (including California CCPA/CPRA), and local data protection laws across all jurisdictions where we operate
- Providing transparency about cookie usage to website visitors globally
- Respecting user privacy rights and preferences across all jurisdictions
- Enhancing user experience through appropriate cookie functionality
- Protecting client confidentiality in online interactions
- Maintaining professional standards across all digital touchpoints
- Meeting data localization and cross-border transfer requirements in China

5. **Impact Statement**

A compromise of information held and/or processed by Appleby could have the following impact:

- Non-compliance to laws or regulations leading to fines.
- Reputational damage leading to a loss of business.
- Financial loss.
- Non-compliance with Contractual or Panel Terms.

6. **Responsibilities**

Appleby management is responsible for providing the necessary support for the enforcement of this Policy.

The ISMF accepts accountability and responsibility for its obligations to ensure that the appropriate Information Classification and Handling Policy is adhered to and to govern, in conjunction with the information owners, the acceptance of information risk.

All people working in or for the Appleby Group or any related company are expected to take reasonable steps to ensure that the information is protected in line with this Policy and that data which is no longer required is deleted or disposed of at the end of the statutory period.

7. **Scope**

This Policy applies to all Appleby websites (including applebyglobal.com, .cn domain, and regional sites), web applications, mobile applications, and other online services (collectively, "Online Services") that place or read cookies and similar technologies on user devices. This includes all Appleby offices and jurisdictions including Jersey, Guernsey, Isle of Man,

Bermuda, British Virgin Islands, Cayman Islands, Hong Kong, Shanghai, Shenzhen, Mauritius, Seychelles, and all other locations where Appleby operates.

Notwithstanding any other provisions of the Policy, all aspects of data protection and the privacy rights of individuals (excluding issues that are related exclusively and specifically to the use of cookies) referred to herein are solely governed by Bermuda's Personal Information Protection Act 2016 (PIPA). To the extent of any conflict between this Policy and PIPA, the use of personal information in Bermuda shall be governed exclusively by PIPA. Accordingly, our Bermuda office's applicable "PIPA Privacy Notice" concerning the privacy rights of individuals supersedes this document, and can be found on that office's designated website:

<https://www.applebyglobal.com/wp-content/uploads/PIPA-Privacy-Notice-Bermuda.pdf>

Jurisdictional Application: Different sections of this policy apply based on the user's location and the applicable legal framework. Users in mainland China are subject to PIPL requirements detailed in Section 15.1.

8. Introduction

This Cookie Policy outlines how Appleby Global Group Services Limited uses cookies and similar technologies to recognize users when they visit our Online Services. This Policy explains these technologies in detail, their purposes, and how they comply with applicable data protection regulations.

9. What are Cookies

Cookies are small text files stored on a user's device (computer, tablet, smartphone) when they visit websites. They enable websites to remember user actions and preferences over time, enhancing the efficiency of our Online Services, improving user experience, and delivering personalized content. Cookies may contain identifiers, timestamps, and other information that helps websites function properly.

10. Types of Cookies by Duration

Session Cookies: Temporary cookies that are deleted when you close your browser. They enable website features during your browsing session.

Persistent Cookies: Cookies that remain on your device for a set period or until manually deleted. They remember your preferences across multiple visits.

11. First Party vs Third-Party Cookies

First-Party Cookies: Set by Appleby's domain and only readable by us. Used for essential site functionality and performance monitoring.

Third-Party Cookies: Set by external service providers (e.g., analytics, advertising platforms). These allow third parties to track users across multiple websites.

12. Types of Cookies We Use

- **Essential Cookies**

Purpose: Required for basic website operation and security features. Enable core functionalities such as page navigation, access to secure areas, session management, and security features.

Legal Basis: Legitimate interest (Article 6(1)(f) GDPR) - necessary for website functionality

Consent Required: No - these cookies are necessary for the website to function

Typical Duration: Session or up to 1 year

Examples: Session management, security tokens, load balancing, authentication cookies

• **Performance Cookies (Analytics)**

Purpose: Collect data on how users interact with our Online Services, including which pages are visited most often, error messages, loading times, and user navigation patterns. This information helps us improve website functionality and user experience.

Legal Basis: Consent (Article 6(1)(a) GDPR)

Consent Required: Yes

Typical Duration: Up to 2 years

Data Processing: Information is typically collected anonymously and aggregated. May include IP addresses, page views, time spent, click patterns, and referral sources.

• **Functional Cookies (Preference)**

Purpose: Enable enhanced functionality and personalization by remembering user choices such as language preferences, region, display settings, font size, and previously entered information in forms.

Legal Basis: Consent (Article 6(1)(a) GDPR)

Consent Required: Yes

Typical Duration: Up to 1 year

Examples: Language selection, region settings, accessibility preferences, saved form data

• **Targeting/Advertising Cookies (Marketing)**

Purpose: Track visitors across websites to build a profile of interests and display relevant advertisements. Used to deliver targeted marketing content, measure campaign effectiveness, and limit ad frequency.

Legal Basis: Consent (Article 6(1)(a) GDPR)

Consent Required: Yes

Typical Duration: Up to 13 months (varies by provider)

Profiling: These cookies may involve automated profiling based on browsing behaviour, demographics, and inferred interests. Profiles are used to personalize advertising content.

Examples: Behavioural advertising, retargeting campaigns, conversion tracking, social media advertising pixels

13. **Detailed Cookie Inventory**

The following table provides specific information about cookies currently used on our Online Services for applebyglobal.com and applebyglobal.cn:

Cookie Name	Provider	Purpose	Category	Party Type	Expiry
-------------	----------	---------	----------	------------	--------

CookieConsent	www.applebyglobal.com	Stores the user's cookie consent state for the current domain	Essential	1st Party	Persistent
ASPSESSIONID#	sites-appleby.vuturvx.com	Preserves users states across page requests.	Essential	1 ST Party	Session
__cf_bm [x2]	Vimeo www.applebyglobal.com	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	Essential	3 rd Party	1 day
_cfuvid [x2]	Cloudflare Vimeo	This cookie is used by Cloudflare to support website security and protect against malicious traffic by maintaining session integrity and identifying trusted users.	Essential	3rd Party	Session
_GRECAPTCHA	Google	This cookie is set by Google reCAPTCHA to protect the website from spam and abuse by distinguishing human users from automated programs.	Essential	3rd Party	180 Days
cf.turnstile.u	Cloudflare	This cookie is used to distinguish between humans and bots.	Essential	3rd Party	Persistent
rc::a	Google	This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website.	Essential	3rd Party	Persistent
rc::b	Google	This cookie is used to distinguish between humans and bots.	Essential	3rd Party	Session
rc::c	Google	This cookie is used to distinguish between humans and bots.	Essential	3rd Party	Session
rc::f	Google	This cookie is used to distinguish between humans and bots.	Essential	3rd Party	Persistent
test_cookie	Google	Used to check whether the user's browser supports	Essential	3rd Party	1 Day

		cookies, enabling security and abuse-prevention services to function correctly.			
uw-icon-locales	cdn.userway.org	Used to keep settings on the website's accessibility widget. This helps people with e.g. vision disabilities to properly navigate the site.	Essential	3rd Party	Persistent
uw-tunings	cdn.userway.org	Used to keep settings on the website's accessibility widget. This helps people with e.g. vision disabilities to properly navigate the site.	Essential	3rd Party	Persistent
uw-tunings-checksum	cdn.userway.org	Used to keep settings on the website's accessibility widget. This helps people with e.g. vision disabilities to properly navigate the site.	Essential	3rd Party	Persistent
uw-uid	cdn.userway.org	Used to keep settings on the website's accessibility widget. This helps people with e.g. vision disabilities to properly navigate the site.	Essential	3rd Party	Persistent
_ga	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3 rd Party	Persistent
ga#	Google	Used to send data to Google Analytics about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3 rd Party	Persistent
_gcl_au	Google	Used to measure the efficiency of the website's advertisement efforts, by collecting data on the conversion rate of the website's ads across multiple websites.	Statistics	3rd Party	Persistent
_gcl_ls	Google	Tracks the conversion rate between the user and the advertisement banners on the website - This serves to	Statistics	3rd Party	Persistent

		optimise the relevance of the advertisements on the website.			
EappsInstagramFeedCache#Items	Elfsight	Used by Instagram to gather information on which product/events the user might be interested in, in order to optimize advertisement relevance.	Statistics	3rd Party	Persistent
elfsight_viewed_recently	Elfsight	Determines which products the user has viewed, allowing the website to promote related products.	Statistics	3rd Party	Persistent
pagead/1p-user-list/#	Google	Tracks if the user has shown interest in specific products or events across multiple websites and detects how the user navigates between sites. This is used for measurement of advertisement efforts and facilitates payment of referral-fees between websites.	Statistics	3rd Party	Persistent
_s	www.sejda.com	Collects data on user behaviour and interaction in order to optimize the website and make advertisement on the website more relevant.	Statistics	3 rd Party	Session
Hm_ck_#	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
Hm_lpv#	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
Hm_lpv#	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
Hm_lvt_#	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor	Statistics	3rd Party	Persistent

		across devices and marketing channels.			
Hm_lvt_#	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
Hm_unsent_#	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
HMACCOUNT [x2]	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
HMACCOUNT	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent
HMACCOUNT_BFESS	Baidu	Used to send data to Baidu about the visitor's device and behavior. Tracks the visitor across devices and marketing channels.	Statistics	3rd Party	Persistent

Note: This table should be regularly updated through cookie scanning tools to ensure accuracy. The IT team should conduct quarterly audits to verify all cookies in use.

14. Third-Party Cookie Providers

We work with the following third-party service providers who may set cookies on your device when you use our Online Services:

Provider	Service	Privacy Policy
Google Analytics	Website analytics	https://policies.google.com/privacy
Google Ads	Google Advertising	https://policies.google.com/privacy
Vuture	Email Marketing	https://meetmarigold.com/company/compliance/marigolds-privacy-notice
Vimeo	Video functionality	https://vimeo.com/legal/privacy/policy

Userway.org	Accessibility	https://userway.org/privacy/
Baidu Tongji	Website Analytics on https://www.applebyglobal.cn/	https://tongji.baidu.com/web/help/article?id=330&type=0
MikeCRM (mainly used on WeChat)	Event registrations and managements	http://wiki.mikecrm.com/general-user-agreement
Elfsight	Widget functionality & accessibility	https://elfsight.com/privacy-policy/
www.sejda.com	Functional / technical	https://www.sejda.com/privacy

These third parties may process your personal data in accordance with their own privacy policies. We recommend reviewing their policies to understand their data practices.

15. International Data Transfers

Some of our third-party service providers are located outside the European Economic Area (EEA) and may process your data in countries that may not provide the same level of data protection as your home jurisdiction.

Countries where data may be transferred:

[]

Safeguards in place:

- Standard Contractual Clauses (**SCCs**) approved by the European Commission
- EU-US Data Privacy Framework (where applicable)
- Adequacy decisions by the European Commission (e.g., Mauritius)

You have the right to obtain a copy of the safeguards we have in place for international transfers by contacting our Data Protection Officer at dpo@global-ags.com.

15.1 Special Requirements for China Operations (PIPL Compliance)

CHINA USERS: If you are accessing our services from mainland China (including Shanghai and Shenzhen offices), this section applies to you in addition to the general provisions above. The requirements below are mandatory under China's Personal Information Protection Law (PIPL). 本节适用于从中国大陆访问我们服务的用户。

15.2 Legal Framework

Users accessing our services from mainland China are subject to the Personal Information Protection Law of the People's Republic of China (**PIPL**), which came into effect on November 1, 2021. PIPL has stricter requirements than GDPR and governs the processing of personal information within mainland China.

Supervisory Authority:

Cyberspace Administration of China (CAC) - www.cac.gov.cn

15.3 Definition of Personal Information Under PIPL

Under PIPL, "personal information" is defined more broadly than under GDPR and includes any information related to identified or identifiable natural persons recorded by electronic or other means. This includes:

- Device identifiers and IP addresses collected through cookies
- Browsing history and website interaction data
- Location data inferred from IP addresses
- Any other information that can be used alone or combined with other information to identify a natural person

15.4 Consent Requirements for China Users**Explicit Separate Consent Required:**

Under PIPL, we must obtain explicit, separate consent before placing ANY cookies on your device, including analytics cookies. This means:

- No Implied Consent: Continued use of the website does not constitute consent
- Affirmative Action Required: You must actively click to accept cookies
- Separate from Other Consents: Cookie consent cannot be bundled with terms of service acceptance
- Clear and Specific: Consent must be informed, with clear explanation of purposes and consequences
- Freely Given: Services cannot be conditioned on consent to non-essential cookies

15.5 Data Localization Requirements

Personal information collected from users in mainland China through cookies must be stored within mainland China. This includes:

- Cookie data collected from .cn domain visitors
- Analytics data from Shanghai and Shenzhen office users
- Any personal information derived from cookie processing

Technical Implementation:

We maintain separate server infrastructure in mainland China to ensure cookie data from Chinese users is stored locally and does not automatically transfer outside mainland China.

15.6 Cross-Border Data Transfer Restrictions

If it is necessary to transfer personal information collected through cookies outside of mainland China, PIPL requires:

- **Security Assessment:** For Critical Information Infrastructure Operators (CIIOs) or transfers exceeding specified thresholds, a security assessment by the CAC is required

- **Professional Institution Certification:** Alternatively, certification by a CAC-approved professional institution
- **Standard Contracts:** Use of standard contracts formulated by CAC
- **Individual Consent:** Separate, informed consent from individuals for cross-border transfers

Current Practice: We minimize cross-border transfers of cookie data from China users. Where transfers are necessary for service provision, we comply with applicable CAC requirements and obtain separate consent.

15.7 Sensitive Personal Information

Under PIPL, certain categories of personal information are considered "sensitive" and require special handling. While standard cookies typically do not collect sensitive personal information, users should be aware that PIPL considers the following as sensitive:

- Biometric information
- Religious beliefs, specific identity, medical health information
- Financial account information
- Location tracking data
- Personal information of minors under 14 years old

If cookies are used to collect or derive sensitive personal information, we will obtain separate consent and implement enhanced security measures.

15.8 Language Requirements

PIPL requires that all user-facing materials, including cookie policies, consent forms, and privacy notices, be provided in Chinese language for users in mainland China. This policy document is available in both English and Chinese on the .cn domain.

Chinese Version: [Insert link to Chinese language version of this policy]

In the event of any discrepancy between the English and Chinese versions, the Chinese version shall prevail for users in mainland China.

15.9 Rights of China Users

In addition to the GDPR rights outlined in Section 22, users in mainland China have the following specific rights under PIPL:

- **Right to Know and Right to Decide:** The right to be informed about personal information processing and to make autonomous decisions
- **Right to Limit or Refuse:** The right to limit or refuse others' processing of personal information
- **Right to Access and Copy:** The right to access and obtain copies of personal information from us
- **Right to Transfer:** The right to transfer personal information to other entities under conditions specified by CAC
- **Right to Correct or Supplement:** The right to request correction or supplementation of inaccurate or incomplete information
- **Right to Delete:** The right to request deletion of personal information in specified circumstances

- **Right to Request Explanation:** The right to request explanation of our information processing rules

Exercising Your Rights:

China users can exercise these rights by contacting: []

We will respond to requests within 15 days as required by PIPL, or within a reasonable time if an extension is necessary.

15.10 Minors' Personal Information

Under PIPL, special protections apply to the personal information of minors under 14 years old. Our services are not directed at children, but if we become aware that we have collected personal information through cookies from a child under 14 in mainland China, we will:

- Delete the information immediately unless we have obtained consent from the child's parent or guardian
- Implement enhanced security measures for any necessary retention of minors' information
- Develop separate privacy policies specific to minors if we provide services directed at children

15.11 Automated Decision-Making Under PIPL

When using cookies for automated decision-making (such as personalized advertising based on browsing behavior), PIPL requires:

- **Transparency:** Clear disclosure of the logic, mechanism, and procedures involved
- **Fairness and Equity:** Decisions must be fair, equitable, and not engage in unfair differential treatment
- **Opt-Out Option:** Provide convenient options to refuse automated decision-making
- **Alternative Options:** Provide non-profiled options for goods or services

15.12 Compliance Certification

Appleby maintains data protection impact assessments and compliance documentation as required by PIPL for our China operations. These assessments cover:

- Purpose and necessity of cookie processing
- Impact on personal information rights and interests
- Security measures implemented
- Legality, legitimacy, and necessity of processing

15.13 Abu Dhabi Global Market (ADGM) Data Protection Requirements

ADGM USERS: If you are accessing our services from the Abu Dhabi Global Market free zone, this section applies to you in addition to the general provisions above. The requirements below are mandatory under the ADGM Data Protection Regulations 2021.

15.14 Legal Framework

Users accessing our services from within the Abu Dhabi Global Market (ADGM) are subject to the ADGM Data Protection Regulations 2021 (ADGM DPR), which came into force on 8 February 2021 and was last amended on 14 June 2023. The ADGM DPR is closely modeled on the EU GDPR but includes specific requirements for the ADGM jurisdiction.

15.15 Scope of ADGM DPR

The ADGM DPR applies to:

- Data Controllers and Data Processors established in ADGM processing personal data
- Data Controllers and Data Processors not established in ADGM offering goods or services to data subjects in ADGM
- Processing of personal data of data subjects who are in ADGM when the processing relates to monitoring their behaviour in ADGM

Appleby's ADGM Operations: This includes our office operations within ADGM and any cookie-based processing of ADGM residents accessing our services.

Key Definitions Under ADGM DPR

Personal Data: Any information relating to an identified or identifiable natural person. For cookie processing, this includes:

Device identifiers and IP addresses
 Browsing history and website interaction data
 Location data inferred from IP addresses
 Unique identifiers stored in cookies
 Any information that can identify an individual when combined with other data

Data Controller: Appleby Global Group Services Limited, as the entity determining the purposes and means of processing personal data through cookies.

Lawful Basis for Cookie Processing

Under ADGM DPR, cookie processing must have a lawful basis. We rely on:

Consent (Article 6(1)(a)): For non-essential cookies including performance, functional, and marketing cookies. Consent must be:

- Freely given
- Specific and informed
- Unambiguous indication of wishes
- Clear affirmative action (not pre-ticked boxes)
- Withdrawable at any time as easily as given

Legitimate Interests (Article 6(1)(f)): For essential cookies necessary for website functionality, security, and fraud prevention.

15.16 Consent Requirements

When we process your personal data through cookies based on consent (Article 6(1)(a) and Article 7 ADGM DPR), we ensure:

- No implied consent: Silence, pre-ticked boxes, or inactivity do not constitute valid consent
- Affirmative action required: You must take a clear action such as clicking 'Accept' or toggling cookie categories on
- Granular control: You can consent to specific cookie categories separately (essential, performance, functional, marketing)
- Prior consent: Non-essential cookies are not placed until after you provide consent
- Separate from other agreements: Cookie consent is not bundled with Terms & Conditions acceptance
- Easy withdrawal: You can withdraw consent at any time via the Cookie Preference Center, and withdrawal is as easy as giving consent
- No cookie walls: Access to our website is not conditional on providing consent to non-essential cookies

15.17 Data Subject Rights Under ADGM DPR

ADGM residents have the following rights regarding personal data processed through cookies:

- Right of Access (Article 15): Request confirmation of whether we process your personal data and access to that data
- Right to Rectification (Article 16): Request correction of inaccurate personal data
- Right to Erasure (Article 17): Request deletion of your personal data (subject to legal exceptions)
- Right to Restriction of Processing (Article 18): Request limitation of how we process your data
- Right to Data Portability (Article 20): Receive your data in machine-readable format
- Right to Object (Article 21): Object to processing based on legitimate interests
- Right to Withdraw Consent (Article 7(3)): Withdraw cookie consent at any time via Cookie Preference Center

Response Time: We respond to data subject requests within 1 month of receipt, with possible 2-month extension for complex requests (Article 12(3)).

15.18 International Data Transfers from ADGM

When cookie data is transferred outside ADGM, we ensure appropriate safeguards under Chapter V ADGM DPR:

- Adequacy Decisions: Transfers to jurisdictions recognized as providing adequate protection (EU/EEA)
- Standard Contractual Clauses (SCCs): For transfers to non-adequate jurisdictions
- Binding Corporate Rules (BCRs): For transfers within Appleby's global operations
- Explicit Consent: Where no other safeguard is appropriate and you have been informed of risks

15.19 Current Transfer Destinations:

- United States: Transfers protected by Standard Contractual Clauses
- United Kingdom: Adequacy decision in place
- European Economic Area: Adequacy decision in place

15.20 Contact Information

Data Protection Officer:

Email: dpo@global-ags.com

ADGM Supervisory Authority:

Office of Data Protection – ADGM Registration Authority

Email: data.protection@adgm.com

Website: www.adgm.com/operating-in-adgm/office-of-data-protection

You have the right to lodge a complaint with the Office of Data Protection if you believe your rights under the ADGM DPR have been violated.

15.21 United States Consumer Privacy Rights

US USERS: If you are accessing our services from the United States, this section explains your privacy rights under applicable US state privacy laws. You have specific rights to control how your personal information collected through cookies is used.

15.22 Applicable State Privacy Laws

As of December 2025, comprehensive consumer privacy laws are in effect in the following 20 US states:

California (CCPA/CPRA), Virginia (VCDPA), Colorado (CPA), Connecticut (CTDPA), Utah (UCPA), Texas (TDPSA), Oregon (OCA), Montana (MCDPA), Iowa (ICDPA), Delaware (DPDPA), New Hampshire (NHPA), New Jersey (NJCDPA), Nebraska (NDPA), Tennessee (TIPA), Minnesota (MCDPA), Maryland (MODPA).

Additional states with laws effective in 2026: Indiana, Kentucky, Rhode Island.

15.23 US Opt-Out Model vs GDPR Opt-In

CRITICAL DIFFERENCE:

US state privacy laws generally follow an opt-out model, meaning cookies can be placed first and consumers can opt-out later. However, Appleby implements the more protective GDPR opt-in model globally, which EXCEEDS US requirements.

What This Means for US Users:

- You receive SUPERIOR privacy protection compared to US legal minimums
- We ask for your consent BEFORE placing non-essential cookies (not required under most US laws)
- You have all the rights listed below PLUS the enhanced protections of the GDPR approach

15.24 California CCPA/CPRA

The California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) provides the most comprehensive consumer privacy protections in the United States.

Personal Information Collected via Cookies:

- Identifiers: Cookie IDs, device IDs, IP addresses, unique identifiers
- Internet Activity: Browsing history, search history, information about interactions with websites
- Geolocation Data: Approximate location inferred from IP address
- Inferences: Profiles reflecting preferences, characteristics, behavior based on cookie data

15.25 'Sale' and 'Sharing' of Personal Information

Definitions Under US State Laws:

- Sale: Exchanging personal information for monetary or other valuable consideration
- Sharing: Disclosing personal information for cross-context behavioral advertising (CPRA addition)

Appleby does not sell personal information for money. However, when we use advertising networks (e.g., Google Ads, LinkedIn Ads) that may use your cookie data for targeted advertising across websites, this may constitute 'sharing' under California law.

15.26 Right to Opt-Out of Sale/Sharing

You have the right to opt-out of the sale or sharing of your personal information. You can exercise this right by:

- Using the Cookie Preference Centre to disable marketing cookies
- Clicking the 'Do Not Sell or Share My Personal Information' link in our website footer
- Enabling Global Privacy Control (GPC) in your browser

After You Opt-Out:

- We stop sharing your information with advertising networks
- Marketing cookies are removed from your device
- You may still see ads, but they will not be targeted based on your activity
- We honour your opt-out for at least 12 months (California requirement)

15.27 Global Privacy Control (GPC)

Appleby recognizes and honours the Global Privacy Control (GPC) signal, which is required under laws in California, Colorado, Connecticut, Texas, and other states.

What is GPC?

GPC is a browser setting or browser extension that automatically sends an opt-out signal to websites you visit. When we detect a GPC signal from your browser, we treat it as a valid request to opt-out of the sale/sharing of your personal information.

How to Enable GPC:

- Download a GPC-enabled browser or extension at globalprivacycontrol.org
- Enable the GPC setting in your browser
- No additional action needed - we automatically honour the GPC signal

15.28 Your Rights Under US State Privacy Laws

Subject to applicable state laws, you have the following rights:

- Right to Know: Request information about what personal information we collect, use, and disclose
- Right to Access: Request a copy of your personal information
- Right to Delete: Request deletion of your personal information
- Right to Correct: Request correction of inaccurate personal information
- Right to Data Portability: Receive your personal information in a portable, machine-readable format
- Right to Opt-Out: Opt-out of sale/sharing of personal information and targeted advertising
- Right to Non-Discrimination: Not receive discriminatory treatment for exercising your rights
- Right to Appeal: Appeal our decision if we deny your request

15.29 How to Exercise Your Rights

For Cookie-Related Requests:

- Cookie Preferences: Use the Cookie Preference Centre (link in footer)
- Opt-Out of Sale/Sharing: Reject marketing cookies in the Cookie Preference Centre OR click 'Do Not Sell or Share My Personal Information'

For Other Privacy Rights:

- Email: dpo@global-ags.com (Subject: 'US Privacy Rights')
- Response Time: We respond within 45 days under most state laws

16. Consent and Cookie Preference Management

Cookie Banner

When you first visit our Online Services, you will see a cookie banner explaining our use of cookies. The banner provides:

- Clear information about cookie usage
- Options to 'Accept All' or 'Reject All' non-essential cookies
- Link to Cookie Settings for granular control
- Link to this full Cookie Policy

We do not place non-essential cookies until you have provided explicit consent. Essential cookies are placed automatically as they are necessary for website functionality.

Cookie Preference Center

You can manage your cookie preferences at any time through our Cookie Preference Center, accessible via:

- The cookie banner (on first visit)
- Cookie Settings link in the website footer
- [Insert URL to cookie preference center]

The Preference Center allows you to:

- Accept or reject each category of non-essential cookies separately
- View detailed information about each cookie category
- Change your preferences at any time
- See which cookies are currently active on your device

17. Consent Requirements

Opt-in Consent: We require explicit opt-in consent for all non-essential cookies. Cookies will not be activated until you actively consent.

Granular Control: You can choose which categories of non-essential cookies to accept. You are not required to accept all cookies to use our website.

Easy Withdrawal: You can withdraw your consent at any time through the Cookie Preference Center. Withdrawal is as easy as giving consent.

No Pre-selected Boxes: Non-essential cookie categories are not pre-selected or enabled by default.

Withdrawing Consent

To withdraw your cookie consent:

- Access the Cookie Preference Center via the footer link
 - Toggle off the cookie categories you no longer wish to use
 - Click 'Save Preferences'
 - Alternatively, delete cookies through your browser settings (see Section 14)

Withdrawing consent will not affect the lawfulness of processing based on consent before withdrawal. Existing cookies will be deleted, and new cookies in those categories will not be placed.

18. Managing Cookies Through Browser Settings

Most web browsers allow you to control cookies through browser settings. You can:

- View which cookies are stored and delete them individually or all at once
- Block third-party cookies
- Block cookies from specific websites
- Block all cookies from being set
- Delete all cookies when you close your browser

Browser-specific instructions:

- **Google Chrome:** Settings > Privacy and security > Cookies and other site data
- **Mozilla Firefox:** Settings > Privacy & Security > Cookies and Site Data
- **Safari:** Preferences > Privacy > Cookies and website data
- **Microsoft Edge:** Settings > Cookies and site permissions > Cookies and site data
- **Opera:** Settings > Privacy & security > Cookies

Note: If you disable cookies entirely, some features of our Online Services may not function properly. Essential cookies are necessary for basic website operation.

19. **Do Not Track (DNT) Signals**

Some browsers offer a 'Do Not Track' (DNT) signal. Currently, there is no industry consensus on how to respond to DNT signals. Appleby does not respond to DNT signals at this time. Instead, we recommend using our Cookie Preference Center to manage your privacy preferences effectively.

20. **Consequences of Refusing Cookies**

You can choose to reject non-essential cookies without losing access to our Online Services. However, certain functionality may be affected:

21. **Essential Cookies Only**

Available:

- All core website functionality
- Secure access to client portals
- Basic navigation
- Form submissions

Not Available:

- Personalized content based on preferences
- Saved language/region settings across sessions
- Enhanced user experience features

Important: Refusing cookies does not prevent you from accessing our core legal services or contacting our offices. Essential website functions remain fully available.

22. **Your Rights Under GDPR**

Under the General Data Protection Regulation, you have the following rights regarding your personal data processed through cookies:

23. **Right of Access**

You have the right to request confirmation of whether we process your personal data through cookies and, if so, access to that data. We will provide you with information about the purposes of processing, categories of data, and recipients of the data.

24. **Right to Rectification**

If personal data processed through cookies is inaccurate or incomplete, you have the right to have it corrected or completed.

25. **Right to Erasure ('Right to be Forgotten')**

You have the right to request deletion of your personal data processed through cookies in certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected, or when you withdraw consent.

26. **Right to Restriction of Processing**

You can request that we limit the processing of your personal data in specific circumstances, such as when you contest the accuracy of the data or object to processing.

27. **Right to Object**

You have the right to object to processing of your personal data based on legitimate interests or for direct marketing purposes. This can be exercised through the Cookie Preference Center.

28. **Right to Data Portability**

You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller where technically feasible.

29. **Right to Withdraw Consent**

Where processing is based on consent, you have the right to withdraw that consent at any time through the Cookie Preference Center. Withdrawal does not affect the lawfulness of processing based on consent before withdrawal.

30. **Right to Lodge a Complaint**

You have the right to lodge a complaint with a supervisory authority if you believe our cookie practices violate data protection law. Relevant supervisory authorities include:

- **Jersey:** Jersey Office of the Information Commissioner (oicjersey.org)
- **Guernsey:** Office of the Data Protection Commissioner (odpa.gg)
- **UK:** Information Commissioner's Office (ico.org.uk)
- **EU/EEA:** Data Protection Authority in your member state
- **Cayman Islands:** Cayman Islands Ombudsman (ombudsman.ky)
- **BVI:** Office of the Data Protection Commissioner BVI
- **Hong Kong:** Office of the Privacy Commissioner for Personal Data (pcpd.org.hk)
- **China (Mainland):** Cyberspace Administration of China (CAC) / 国家互联网信息办公室
- **Mauritius:** Data Protection Office (DPO) (dataprotection.govmu.org)
- **Seychelles:** Data Protection Commissioner (dataprotection.sc)
- **ADGM:** Office of Data Protection – ADGM Registration (www.adgm.com)
- **US:** For US residents, you may file a complaint with the Attorney General in your state.
California residents may also contact the California Privacy Protection Agency (cppa.ca.gov)

31. **Exercising Your Rights**

To exercise any of these rights, please contact:

Data Protection Officer

Email: dpo@global-ags.com

Address: [Insert postal address]

We will respond to your request within one month, unless the request is complex or we receive multiple requests, in which case we may extend this period by a further two months.

32. **Automated Decision-Making and Profiling**

Some cookies, particularly Marketing/Advertising cookies, may be used for automated profiling purposes:

33. **What is Profiling**

Profiling is automated processing of personal data to evaluate certain characteristics about individuals, such as interests, behavior patterns, preferences, and demographics. Marketing cookies may create profiles based on your browsing history to deliver targeted advertisements.

34. **Scope of Profiling**

Limited Purpose: We only use profiling for marketing optimization and do not make decisions that significantly affect you based solely on automated processing.

No Legal Effects: Profiling through cookies does not produce legal effects concerning you or similarly significantly affect you.

Your Control: You can opt out of profiling activities by rejecting Marketing/Advertising cookies in the Cookie Preference Center.

Logic and Consequences: Marketing cookies analyze your interactions with our website to infer interests. The consequence is personalized advertising that may be more relevant to you.

35. **Your Rights Regarding Profiling**

You have the right to:

- Not be subject to decisions based solely on automated processing (not applicable to our cookie usage)
- Object to profiling activities
- Request human intervention regarding automated decisions
- Express your point of view
- Contest any decision made through automated processing

36. **Children's Privacy**

Our Online Services are not directed at children under the age of 16. We do not knowingly collect personal data from children through cookies. If you are under 16 years old, please do not use our websites or provide any personal information.

If we become aware that we have collected personal data from a child under 16 through cookies without parental consent, we will take steps to delete that information as quickly as possible. Parents or guardians who believe we may have collected information from a child should contact our Data Protection Officer immediately.

37. **Cookie Refresh and Consent Expiry**

Cookie Lifespan: Each cookie has a specific lifespan after which it expires and is automatically deleted (see Section 10 for specific durations).

Consent Validity: Your cookie consent remains valid for 12 months from the date you provide it.

Re-consent Process: After 12 months, you will be asked to review and update your cookie preferences. This ensures your preferences remain current and valid.

Cookie Refresh: Some cookies automatically refresh when you revisit our websites. This extends their expiration date based on your continued use of our services.

Preference Updates: If we make material changes to our cookie practices, we will request your consent again even before the 12-month period expires.

38. **Changes to this Policy**

We may update this Cookie Policy periodically to reflect changes in:

- Our cookie practices
- Legal or regulatory requirements
- Technology changes
- Business operations

Notification of Changes:

- Material changes will be prominently displayed on our website
- The 'Last Reviewed' date at the top of this policy will be updated
- For significant changes affecting your rights, we may require fresh consent

Recommendation: We advise users to review this policy regularly to stay informed about our cookie practices and related technologies.

39. **Contact Information**

If you have any questions or concerns about this Cookie Policy, our cookie practices, or wish to exercise your rights, please contact:

Data Protection Officer

Appleby Global Group Services Limited

Email: dpo@global-ag.com

Postal Address: [Insert postal address]

Telephone: [Insert telephone number]

General Inquiries:

Email: info@global-ag.com

Website: www.applebyglobal.com

40. **Policy Enforcement**

Responsibilities

Management: Appleby management is responsible for providing necessary support for enforcement of this Policy.

ISMF: The Information Security Management Forum accepts accountability for ensuring compliance with this Policy.

IT Department: Responsible for technical implementation, maintenance, and monitoring of cookie management systems.

Marketing Department: Responsible for ensuring all marketing activities comply with consent requirements.

All Personnel: All partners, employees, and contractors must comply with this Policy when managing website content or online services.

Violations

Any violation of this Policy, including unauthorized placement of cookies without proper consent mechanisms, failure to update cookie inventories, or non-compliance with user preference settings, shall be investigated and may result in:

- Disciplinary action up to and including termination of employment
- Termination of contractual relations for third parties, contractors, or consultants
- Legal action where appropriate

41. **Compliance Monitoring**

Regular audits will be conducted:

- Quarterly cookie scans using automated tools
- Annual review of third-party cookie providers
- Bi-annual testing of cookie consent mechanisms
- Continuous monitoring of data protection law changes

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