



PRIVACY POLICY

Griffin Trustees Limited (“the Company”) operates in accordance with the provisions of domestic privacy legislation (in particular, the Data Protection Act 2018), the EU General Data Protection Regulation (“the GDPR”), the regulatory requirements of the British Virgin Islands Financial Services Commission (“the FSC”) and the requirements of the Company’s professional indemnity insurers.

The Company is committed to protecting your privacy. This notice describes how we collect and use your personal data. It also describes the rights you have and control you can exercise in relation to it.

Who we are

The Company is a trust company providing client services worldwide.

If you have any questions about the Company’s use of your personal data, please contact the Company by registered post, recorded delivery or courier at Griffin Trustees Limited, 3076 Sir Francis Drake Highway, Ellen Skelton Building, Ground Floor, Road Reef, PO Box 765, Road Town, Tortola, VG 1110, British Virgin Islands or by email at md@griffintrustees.com.

Data collection and usage

We will collect the following personal data:

- Contact information: your name, position, role, company or organisation, telephone (including mobile phone number where provided) as well as email and postal address;
- Business information: data identifying you in relation to matters on which you engage our services or in which you are involved;
- Information from public sources: e.g. Linked In and similar professional networks, directories or internet publications;
- Information in connection with investigations or proceedings: where this is necessary to conduct the investigation or proceedings;
- Attendance records: to record your attendance at our offices for security purposes;
- Subscriptions/preferences: when you subscribe to receive briefings, updates or newsletters as well as consent preferences to help us identify which materials you are interested in receiving;
- Events data: attendance at and provision of feedback forms in relation to our events;
- Supplier data: contact details and other information about you or your company or organisation where you provide services to the Company;



- Social media: posts, likes, tweets and other interactions with our social media presence;
- Technical information: when you access the Company's website and our technology services being IP address, browser type and version (e.g. Internet Explorer, Firefox, Safari etc.), time zone setting, browser plug-in types and versions, operating system you are using (e.g. Vista, Windows XP, MacOS, etc), device type, hardware model, MAC address, unique identifiers and mobile network information;
- Online data: when you access the Company's website and our technology services, information about your visit including URL clickstream to, through and from our website (including date and time), information about your network as such as information about devices, nodes, configurations, connection speeds and network application performance; pages viewed or searched for, page response times, download errors, length of visits and interaction information (such as scrolling, clicks, mouse-overs) and whether you click on particular links or open our emails.

The Company does not collect personal data about your online activities across third party websites or online services.

- Special categories of personal data: such as dietary, disability or similar requirements for events and meetings. If you do not provide this information, we may not be able to respond to your particular needs or preferences;
- Criminal record data: where permitted by national law and appropriate to do so, such as existence of prior criminal offences (or confirmation of clean criminal record).

The above data will be provided to us by you, your employer, the company or organisation who is our client or screening providers who assist us with our legal obligations to conduct under anti-money laundering, sanctions screening and regulatory checks.

Your communications with us

The Company may also collect information that you choose to provide in communications with us. Please do not send us confidential information until we have confirmed in writing that we have agreed to be engaged by you or your company or organisation. Unsolicited emails from non-clients do not establish a trustee-client relationship. They may not be privileged and, therefore, may be disclosed to others.

How we use your personal data

We use your personal data for the following purposes:

- Service provision: providing trust management and company formation and management services;



- Business relationship: managing and administering our relationship with you, your company or organisation including keeping records about business contacts, services and payments so we can customise our offering for you, develop our relationship and target our marketing and promotional campaigns;
- Communication: sending emails, newsletters and other messages to keep you informed of legal developments, market insights and of our services;
- Events: running briefings, roundtables and other events;
- Client surveys and feedback: including events feedback and client listening exercises as well as answering issues and concerns which may arise;
- Client legal compliance: client due diligence (under anti-money laundering, sanctions screening and other crime prevention and detection laws and regulatory requirements) which may involve automated screening checks to ensure that clients and contacts are genuine and to prevent fraud or crime and we may not be able take instructions if you do not provide the information we need to do these checks;
- Website monitoring: to check the website and our other technology services are being used appropriately and to optimise their functionality;
- Site security: to provide security to our offices and other premises (normally collecting your name and contact details on entry to our buildings);
- Online security: protecting our information assets and technology platforms from unauthorised access or usage and to monitor for malware and other security threats;
- Regulatory: compliance with our legal and regulatory obligations as a trust company including auditing and reporting requirements;
- Managing suppliers: who deliver services to us;
- Legitimate interest: to pursue the legitimate business interests listed in the “Legitimate Interests” section of this policy below.

Our reasons for using your personal data

We will process your personal data for a number of reasons:

- you have given us consent: for example, where you share details for particular purposes;
- this is necessary to comply with legal or regulatory obligations: for example, anti-money laundering and mandatory client screening checks or disclosure to law enforcement;
- this is necessary to deal with legal claims: for example, involving court proceedings;



- processing is necessary for our legitimate business interests or those of a third party: provided this does not override any interests or rights that you have as an individual. Our legitimate interests are listed in the next section.

Legitimate interests

We have legitimate business interests in:

- providing trust management and company formation and management services;
- managing our business and relationship with you or your company or organisation;
- understanding and responding to inquiries and client feedback;
- understanding how our clients use our services and websites;
- identifying what our clients want and developing our relationship with you, your company or organisation;
- improving our services and offerings;
- enforcing our terms of engagement and website and other terms and conditions;
- ensuring our systems and premises are secure;
- managing our supply chain;
- developing relationships with business partners;
- ensuring debts are paid;
- operating suppressors to exclude you from direct marketing if you unsubscribe;
- sharing data in connection with acquisitions and transfers of our business.

Our reasons for using special category data

Special category data in the EU and certain other jurisdictions refers to sensitive data such as your racial or ethnic origin, religious beliefs or health data. We may also collect data about criminal convictions. We will process this data where:

- we have your explicit consent: for the particular processing;
- this is necessary to protect your vital interests or those of another person: for example, in medical emergencies;
- you have manifestly made the data public: for example, where you have published it on social media;



- this is necessary to deal with legal claims: for example, involving court proceedings;
- this is necessary for substantial public interest: for example, to prevent or detect unlawful acts;
- as permitted by applicable law: outside the EU and other jurisdictions where these restrictions apply.

With whom do we share your data?

We share your information as with others as follows:

- Suppliers: who support our business including IT and communication suppliers, outsourced business support, marketing and advertising agencies and back up suppliers. Our suppliers have to meet minimum standards as to information security and they will only be provided data in line with their function;
- Shared service centres: operated by the Company or third parties including for client on-boarding, IT services, marketing, risk management and office support services;
- Other law firms: including other local or international law firms, barristers, expert witnesses and arbitrators/mediators;
- Law enforcement bodies and our regulators: or other competent authorities in accordance with legal requirements or good practice;
- Appropriate parties in the event of emergencies: in particular to protect health and safety of our clients, staff and organisations;
- Your company or organisation: in relation to us providing our services;
- Screening service providers: so that we can comply with legal obligations in relation to the prevention or protection of crime, anti-money laundering, sanctions screening and other required checks;
- Advertising networks and analytics service providers: to support and display ads on our website, apps and other social media tools;
- Third parties: in the context of the acquisition or transfer of any part of our business or in connection with the business reorganisation;
- Other delegates: where your name will appear on the attendee list for events where you have told us you plan to attend.

Personal data about others

In some cases, you may provide personal data to us about other people (such as your customers, directors, officers, shareholders or beneficial owners). You must ensure that



you have given those individuals an appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

Security

We will hold your information securely in line with physical, technical and administrative security measures. However, the transmission of information via the internet is not completely secure. Although we will take reasonable measures to protect your personal information, we cannot guarantee the security of your information transmitted and any transmission is at your own risk.

Where will your information be held?

As we are a trust company whose staff often work around the globe, your information may be transferred out of your local jurisdiction or region. Data protection laws vary by country and those applicable in the British Virgin Islands, the USA and elsewhere are not equivalent to those applicable in, for example, the EU or certain other jurisdictions. The Company will, take steps to protect your information in line with locally applicable data protection requirements.

How long do we keep your data?

We generally keep your information as needed to provide our services and to deal with claims. This will depend on a number of factors such as whether you or your company or organisation are an existing client or have interacted with recent client mailings or bulletins or attended recent events. We will retain your information as necessary to comply with legal, accounting or regulatory requirements. Typical retention periods will range from 3 to 15 years.

Your Rights

You have certain rights in relation to your information. The availability of these rights and the ways in which you can use them are set out below in more detail. Some of these rights will only apply in certain circumstances. If you would like to exercise, or discuss, any of these rights, please contact the Company.

- Access: you are entitled to ask us if we are processing your data and, if we are, you can request access to your personal data. This enables you to receive a copy of the personal data we hold about you and certain other information about it;
- Correction: you are entitled to request that any incomplete or inaccurate personal data we hold about you is corrected;
- Erasure: you are entitled to ask us to delete or remove personal data in certain circumstances. There are also certain exceptions where we may refuse a request for erasure, for example, where the personal data is required for compliance with the law or in connection with claims;



- **Restriction:** you are entitled to ask us to suspend the processing of certain of your personal data, for example if you want us to establish its accuracy or the reason for processing it;
- **Transfer:** you may ask us to help you request the transfer certain of your personal data to another party;
- **Objection:** where we are processing your personal data based on legitimate interests (or those of a third party) and you may challenge this. However, we may be entitled to continue processing your information. You also have the right to object where we are processing your personal information for direct marketing purposes;
- **Automated decisions:** you may contest any automated decision made about you where this has a legal or similar significant effect and ask for it to be reconsidered.
- **Consent:** where we are processing personal data with consent, you can withdraw your consent.

If you want to exercise any of these rights, please contact the Company.

You also have a right to lodge a complaint with a data protection supervisory authority, in particular in the Member State in the European Union where you are habitually resident where we are based or where an alleged infringement of Data Protection law has taken place. In the UK, for example, you can make a complaint to the Information Commissioner's Office (Tel: 0303 123 1113 or at www.ico.org.uk).

Right to object

You may have a right to object to us processing your information in certain circumstances. This applies where we are processing your personal information based on a legitimate interest (or those of a third party) you may challenge this. However, we may be entitled to continue processing your information based on our legitimate interests or where this is relevant to legal claims. You also have the right to object where we are processing your personal information for direct marketing purposes.

Direct Marketing

As described above, you can opt-out of receiving direct marketing from us at any time.

We may use the information you give us on our website or other means for direct marketing purposes to provide emails, newsletters and other messages to keep you informed of legal developments, market insights and of our services including events that we think may interest you.

You can opt-out of receiving direct marketing from us at any time. You can do this by changing your marketing preferences on your online accounts settings page, clicking on the "unsubscribe" link included at the end of any marketing email we send to you, or by contacting the Company.



Cookies

We use cookies that identify your browser. They collect and store information when you visit our website about how you use it through which it is possible to record your use of the website, as well as provide you with a better service and experience when browsing and for analytics. The personal data we collect through these technologies will also be used to manage your session.

Links to third party websites

Our website, newsletters, email updates and other communications may, from time to time, contain links to and from the websites of others. The personal data that you provide through these websites is not subject to this privacy notice and the treatment of your personal data by such websites is not our responsibility.

If you follow a link to any other websites, please note that these websites have their own privacy notices which will set out how your information is collected and processed when visiting those sites.

Children

We do not knowingly collect information from children or other persons who are under 16 years old. If you are under 16 years old, you may not submit any personal data to us.

Changes to this Notice

This notice may be changed from time to time.

If we change anything important about this notice (the information we collect, how we use it or why) we will highlight those changes at the top of the notice and provide a prominent link to it for a reasonable length of time following the change.

How to contact us

If you would like more information about the way we manage personal data that we hold about you, please contact us as set out at the top of this notice.

Griffin Trustees Limited
November 2018