



FNB INTERNATIONAL TRUSTEES LIMITED

PRIVACY NOTICE

We respect your trust in us to use, store and share your information. This Privacy Notice explains how FNB International Trustees Limited ("FNBIT") collects, uses and discloses your personal data, and your rights in relation to the personal data it holds.

In this Privacy Notice, "us", "we" and "our" refers to FNBIT.

FNBIT is the Data Controller of your personal data and is subject to the Data Protection (Bailiwick of Guernsey Law 2017 ("DPL") and EU General Data Protection Regulation ("GDPR").

FNBIT has appointed a Data Protection Officer who can be contacted by writing to FNBIT at its registered address or by email at enquiries@fnbit.com. Communications should be marked: For the attention of the Data Protection Officer.

We may amend this Privacy Notice from time to time, to reflect any changes in the way that we process your personal data.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. The law says we must have one or more of these reasons:

- To fulfil a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it. You can withdraw your consent at any time by contacting us. If you withdraw your consent we may not be able to provide our services to you.

Your rights

You have the following rights:-

- To obtain access to, and copies of, the personal data that we hold about you;
- To require that we cease processing your personal data if the processing is causing you damage or distress;
- To require us to erase your personal data (your right to be forgotten);
- To require us to restrict our data processing activities;
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and
- To require us to correct the personal data we hold about you if it is incorrect.

You can find out more about your rights under data protection legislation at www.odpa.gg

If you have any questions about how we use your personal data, or you wish to exercise any of the rights set out above, please contact us using any of the following:-

By post: PO Box 602, La Plaiderie House, La Plaiderie, St Peter Port, Guernsey, GY1 4NL

By email: enquiries@fnbit.com

By telephone: +44 1481 748100

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Office of the Data Protection Authority at www.odpa.gg

How we collect your data

We may collect your personal data in a number of ways, for example:-

- From the information you provide to us when you meet with one of our employees;
- When you communicate with us or when we communicate with you by telephone, email or other forms of electronic communication. In this respect, we may monitor, record and store any such communication;
- Information contained within client on-boarding documents relating to a service set up for your benefit by you, or another person on your behalf;
- From other companies in our Group;
- From your agents or advisers; and
- From publicly available sources or from third parties where we need to conduct background checks about you.

The categories of the data we may collect

We may collect the following categories of personal data about you:-

- Your name, date of birth, passport or national identity card details;
- Country of birth, domicile and citizenship;
- Gender and marital status;
- Contact information such as residential or business address, email address and telephone number;
- Information relating to your tax affairs including tax identification or national insurance number;
- Information about your employment, education, family and personal circumstances;
- Information about your knowledge and experience in the investment field;
- An understanding of your goals and objectives in connection with your wealth;
- Information relating to your financial situation such as income, expenditure, assets and liabilities, sources of wealth and your bank account details; and
- Information to assess whether you may represent a money laundering and terrorist financing risk, for example, whether you are a Politically Exposed Person, or have had previous criminal convictions or regulatory sanctions imposed.

The basis for processing your data other than with your consent, how we use that data and whom we share it with

We may process your personal data because it is necessary for the performance of a contract to deliver the services you have engaged us for or in order to take steps at your request prior to entering into a contract.

We may use your personal data for the following:-

- To prepare preliminary information or a proposal for you regarding the services we offer;
- To provide you with the services as set out in our terms of business with you or as otherwise agreed with you from time to time;
- To deal with any complaints or feedback you may have;
- For any other purpose for which you provide us with your personal data.

We may share your personal data with the following:-

- Your agents, trustees, advisers, intermediaries, fund and investment managers or employees of firms with which you are associated;
- Brokers, custodians of your assets, banks and third party administrators who we may engage to assist in delivering the services to you;
- Our advisers where it is necessary for us to obtain their advice or assistance;
- Companies within our Group;
- Payment processors where we are making payments on your behalf; and
- Our data storage providers.

We may also process your personal data because it is necessary for our legitimate interests.

We may use your personal data for the following:-

- Training our staff or monitoring their performance;
- For the administration and management of our business; and
- Seeking advice on our rights and obligations, such as where we require our own legal advice;

We may also process your data for our compliance with a legal obligation which we are under.

We may use your personal data for the following:-

- To meet our compliance and regulatory obligations, such as compliance with anti-money laundering and countering terrorist financing regulations, tax reporting and beneficial ownership reporting requirements;
- For the performance of a contract;
- Protecting the vital interests of you or others; and
- Our legitimate interests.

Sharing of data

We may share your personal data with the following:-

- Our advisers where it is necessary for us to obtain their advice or assistance;
- Our auditors where it is necessary as part of their auditing functions;
- With service providers who we may engage to assist in delivering the services to you, where they conduct reviews in accordance with their statutory obligations, including, but not limited to, anti-money laundering and countering terrorist financing;
- With third parties who assist us in conducting background checks about you, such as whether you are on sanctions lists;
- With relevant regulators, tax authorities and law enforcement agencies where we are required to do so.

Transferring of data

We may transfer your personal information outside the European Economic Area (EEA) to help us provide your products and services. We expect the same standard of data protection is applied outside of the EEA to these transfers and the use of the information, to ensure your rights are protected.

Retention of data

We may retain your personal data for a period of 10 years after the termination of our relationship with you in order to meet our regulatory and legal obligations. However, we may retain your personal data for a longer period where necessary to protect against legal claims.

26 October 2020