

CONCEPT GROUP LIMITED

PRIVACY STATEMENT

1 General

- 1.1 This privacy statement describes how Concept collects and uses personal information about you and any personal data connected to any Managed Entity (as defined in clause 3 below), in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017, as amended (the **Guernsey DP Law**).
- 1.2 Concept recognises the importance of this data and the risks related to its possession of such data. Concept is committed to protecting the privacy and security of your personal information.
- 1.3 Concept is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. To comply with data protection legislation and best practice we are required to notify you of the information contained in this privacy notice.
- 1.4 Any questions in relation to this Privacy Statement or requests in respect of personal data should be directed to Concept's Security Information Officer at:

Concept Group Limited
PO Box 130
Cambridge House
St Peter Port
Guernsey
GY1 3HH
+44 1481 723550
sio@cgl.gg

2 About Concept

Concept is licensed to provide fiduciary services in Guernsey by the Guernsey Financial Services Commission. Concept comprises a group of companies providing fiduciary services and operating in Guernsey. References to **Concept, we, our** or **us** means the relevant Concept company or entity responsible for processing your data. Details of the relevant Concept entity will be set out in the application form or product brochure.

3 Who do we collect information on?

This privacy statement applies to the following individuals who we collect personal information from or about:

- (a) those who have entered into, or are contemplating entering into, a contract for the provision of services (**Individual Client**), those who are connected to Individual Clients (such as family members); and those who are connected to a client who is not an individual client (a **Managed Entity**), such as owners, investors, controllers, employees, directors and officers of a corporate client or other legal or non-legal body) (together **clients**)
- (b) third parties with whom we interact as part of providing our services to our clients (**Intermediaries**)

- (c) those who may be party to, or connected to party to, a legal transaction or legal proceedings involving our client and/or the services which we have been engaged to provide to our clients
- (d) those who are, work for or are agents of, suppliers or service providers who provide goods and services to us
- (e) those who request newsletters, marketing material or other publications from us; and
- (f) visitors to our website www.cgl.gg (the **Website**).

4 The kind of information we hold about you

4.1 **Personal data** means any information about a living individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

4.2 There are special categories of more sensitive personal data called **special category data** which require a higher level of protection (as detailed in paragraph 8). This includes information regarding race/ethnicity, health, religious beliefs, biometric data, sexual orientation, criminal convictions and political opinions.

4.3 We may collect, store and use the following categories of personal information about you:

- (a) your contact information including your name (including previous names and known aliases), title, addresses, telephone numbers and email or other electronic communication addresses
- (b) client due diligence information and documentation required for Concept to meet its legal and regulatory requirements. This may include, but is not limited to:
 - (i) identity information such as your passport or other identity document details, date of birth, your place of residence, place of birth, domicile and nationality
 - (ii) information on your overall wealth, source of wealth, source of funds and income including information about your employer, job title and employment status
 - (iii) other information concerning your background
- (c) financial information, such as:
 - (i) bank account and transactional records and tax identification numbers or status information
 - (ii) your personal and business assets and information relevant to specific structures, transactions or issues you seek assistance with
- (d) information relevant to the pension and other fiduciary products we administer for you including:
 - (i) marital status and family relationships
 - (ii) information about your academic history and professional qualifications
 - (iii) information about your service requirements and sectors of interest
 - (iv) Director ID number
 - (v) information on any powers of attorney

- (vi) letter of wishes
 - (e) professional interests and preferences with respect to marketing interactions, events attended by clients, industry professionals, employees and other invited third parties
 - (f) any other information you may provide to us.
- 4.4 We may also collect, store and use the following special category data:
- (a) information about criminal convictions, offences, adverse media or sanctions
 - (b) information about your direct involvement with politics or affiliation with politically exposed persons
 - (c) biometric data including a photographic likeness of you
 - (d) information about your family and personal life relevant to your personal service requirements
 - (e) information about your health and expected life expectancy (especially where you hold a pension product with us).

5 **How is your personal information collected?**

We collect personal information about you through a variety of sources including:

- (a) from yourself
- (b) from third parties including intermediaries/introducers, advisers, other fiduciary providers, accountants, tax advisers, lawyers or your employer
- (c) electronic databases, for example those used to help identify and manage financial, regulatory and reputational risk
- (d) publicly available sources such as Companies House in the UK
- (e) other members of the Concept Group.

6 **IP Addresses**

We may collect information about your computer for system administration, including your IP address, operating system and browser type. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We use IP addresses to analyse trends, administer the Website, track a user's movement, determine whether a user has read electronic communications sent by us and gather broad demographic information. IP addresses are not linked to information which identifies an individual. Additionally, for systems administration, detecting usage patterns and troubleshooting purposes, our web servers automatically log standard access information including browser type, access time/open mail, URL requested and referral URL. This information is not shared with third parties and is used only within Concept on a need-to-know basis. Any information which identifies an individual related to this data will not be used in any way different from that stated above without the user's explicit permission.

7 **Cookies**

We use cookies on our Website, these are small pieces of data that allow us to track which computers visit our Website and how. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them, please review our cookie policy.

8 How we will use information about you including special category data

8.1 We will only use your personal information when the Guernsey DP Law allows us to. We will use your personal information for the legal basis and purposes set out below:

Lawful basis for processing	Purpose
You have given consent	<ul style="list-style-type: none"> (i) to send you direct marketing about our products and services that may be of interest to you (ii) when we use cookies or similar technologies for the purpose explained in our cookie notice (see paragraph 7)
Where necessary for the conclusion of a contract to which you are a party or in your interests	<ul style="list-style-type: none"> (i) to deliver our and services to you (ii) to otherwise perform our obligations under our contract with you (iii) to obtain professional advice on your behalf, including from legal, tax, accounting, property and investment advisers
<p>Where necessary for Concept's or a third party's legitimate interests and where those interests are not overridden by your data protection rights</p> <p>We consider our legitimate interests to include (a) providing fiduciary services, (b) carrying out such services effectively and (c) communicating with you in respect of those aspects of our services which we consider to be of relevance to you.</p>	<ul style="list-style-type: none"> (i) communicate with you through certain mandatory service communications such as welcome letters, billing reminders, pension statements, terms and conditions of engagement; (ii) communicate with you in connection with any services that we are providing to you and otherwise perform the services for you that you have engaged us to provide; (iii) to manage our client, intermediary and other business relationships; (iv) to send you marketing information about our products and services that we think may be of interest to you (except where we require consent for this); (v) perform research and analysis aimed at improving our products, services and technologies; (vi) to identify and manage financial, regulatory and reputational risk; (vii) in order to protect and enforce the rights, property or safety of us, our business, our clients or others; (viii) for information security purposes (including to detect, investigate, monitor, remediate and/or prevent security or cyber incidents) (ix) to ensure the security of Concept systems, staff and premises (x) for compliance, regulatory, audit and investigative purposes.
Where we are required by law to process your personal data	<ul style="list-style-type: none"> (i) to ensure compliance with regulatory requirements and applicable law

	<p>(including anti-money laundering and countering the financing of terrorism checks, international tax reporting and complaint investigation)</p> <p>(ii) to make legally required disclosures to any regulatory, prosecuting, tax or governmental authorities, courts or other tribunals.</p> <p>(iii) to monitor, record, store and share telephone, electronic and other means of communications (including Microsoft Teams recordings) with you or our clients for investigation and fraud prevention purposes</p>
In connection with legal proceedings	(i) in relation to the establishment, exercise or defence of legal claims
The processing is necessary to protect your vital interests and you are not capable of giving consent or we cannot be expected to obtain your explicit consent	(i) actions we consider necessary or desirable to take in connection with protecting the interests of our vulnerable clients. Using your data for these purposes is likely to be rare.

8.2 As special category data requires higher levels of protection, we need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- (a) in limited circumstances, with your explicit written consent.
- (b) where we need to carry out our legal or regulatory obligations.

8.3 Less commonly, we may process special category data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

8.4 We do not need your consent if we use your personal information to carry out our legal and regulatory obligations or exercise specific rights under the law. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

9 If you fail to provide personal information

9.1 If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as processing a transaction on your behalf), or we may be prevented from complying with our legal obligations (such as to ensure you are properly identified and monitored for compliance with anti-money laundering and countering the financing of terrorism legislation).

9.2 In such circumstances, we may need to terminate our business relationship with you, in accordance with clause 9 of our Terms and Conditions of Business.

10 Data sharing

- 10.1 We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. This may involve us sharing your information with:
- (a) any sub-contractors, agents or service providers providing services to any member of the Concept Group, including without limitation, our information technology (including business management software, client-facing application software and cloud computing services) and telecommunications providers, auditors, actuaries, consultants, insurers, business introducers, regulatory service providers (including those providing background checks and business risk screening), debt collection and marketing or business development agencies;
 - (b) bankers, auditors, accountants, legal, registered office and other professional advisers, agents or third parties providing services to you or a Managed Entity to which you are connected;
 - (c) tax advisors and tax compliance service providers;
 - (d) investment advisers, managers and brokers together with custodians;
 - (e) providers of property services, such as architects, building contractors, engineers, sub-contractors, property developers, rental and letting agents, process agents, maintenance contractors, asset management services and valuers of all different types of property;
 - (f) other members or associates of your organisation;
 - (g) other members of the Concept Group;
 - (h) revenue and customs agencies, regulators and other authorities, including registrars of corporate, property and public registers;
 - (i) law enforcement and crime investigation agencies where considered necessary for the Concept group to fulfil legal obligations applicable to it;
 - (j) regulatory, governmental, or judicial authorities (including the Channel Islands Financial Ombudsman) with a legal right to the material or a legitimate interest in any material;
 - (k) in relation to information obtained via our Website and/or business systems/applications (where applicable), analytics and search engine providers that assist us in the improvement and optimisation of our Website, subject to our cookie policy;
 - (l) to the extent permitted by the Guernsey DP Law, other third parties in the context of a potential merger, sale or restructure of any part of the Concept Group
 - (m) organisations you ask us to share your data with.

10.2 All our third-party service providers and other entities in the Group are required to take appropriate security measures to protect your personal information in line with the Guernsey DP Law and our policies.

11 International transfers

11.1 By providing your personal information to Concept you understand it will generally be processed within the Bailiwick of Guernsey, and that we may from time to time as part of our normal business processes, transfer the personal information about you to other countries in order to perform our contract with you or to comply with a legal or regulatory obligation. These countries may have differing (and potentially less stringent) laws relating to the degree of protection afforded to personal information.

Transfers within Guernsey and the EU

- 11.2 Under the Guernsey DP Law, the Concept Group may transfer your data to a person located in Guernsey or the European Union as these jurisdictions have implemented data protection standards equivalent to those found under the Guernsey DP Law.

Transfers outside of Guernsey and the EU

- 11.3 If we transfer personal data from one jurisdiction to another, we will ensure, prior to carrying out the transfer, that the third-party recipient meets the relevant data protection requirements applicable to the data being transferred. This may include only transferring the data where we are satisfied that:
- (a) the recipient is in a jurisdiction which has been deemed to have an adequate level of protection under the Guernsey DP Law;
 - (b) the recipient has contractually agreed to protect the information to the same (or higher) standards required under the Guernsey DP law; or
 - (c) we have obtained consent from you to the transfer (to the extent legally required).

12 Data security

- 12.1 We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.
- 12.2 We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13 Data retention

- 13.1 We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, regulatory or reporting requirements. Retention periods for your personal information are decided by considering the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.
- 13.2 Once our business relationship ends, we will retain and securely destroy your personal data in accordance with our record retention and destruction policy, applicable legislation and/or regulatory requirements.
- 13.3 In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

14 Your rights and duties

- 14.1 It is important that the personal information we hold about you is accurate and current. It is your duty to keep us informed if your personal information changes during your relationship with us. In particular, it is important you keep us informed of changes to your name (including changes by marriage or deed poll), signature, address, telephone numbers, email addresses, nationality, tax residence, tax reference numbers, employment, bank account

details and changes in your family structure (e.g. your marriage or divorce, or the birth of children) where these affect the product we administer for you.

14.2 Where you provide us with personal data about other individuals e.g. joint account holders, dependants/beneficiaries, you confirm that you have their authority to provide this information to us.

14.3 Under certain circumstances, under the Guernsey DP Law you have the following rights:

- (a) **Right of data portability:** the right to request that we transfer a copy of your personal information to another party.
- (b) **Right of access** (commonly known as a "data subject access request"): this enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- (c) **Right to object to processing of your personal information:** you may object to certain types of processing, including direct marketing or where we process your information based on our (or a third party's) legitimate interests.
- (d) **Right to rectification:** this enables you to have any incomplete or inaccurate information we hold about you corrected.
- (e) **Right to erasure (right to be forgotten):** you can ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see above).
- (f) **Right to restriction of processing:** this enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- (g) **Right to be notified of rectification, erasure and restrictions:** if you have exercised your right to have your personal data rectified, erased or the processing of it restricted, and we have disclosed that personal data to another person, you have the right to request that we notify the other person of the rectification, erasure or restriction of processing.
- (h) **Right not to be subject to decisions based on automated processing:** automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you. We do not envisage that any decisions will be taken about you using automated means.
- (i) **Right to withdraw consent:** in the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact our Security Information Officer at sio@cgl.gg. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.
- (j) **Right to complain:** If we are unable to address your questions or concerns to your satisfaction, you may be able to make a complaint to the Office of the Data Protection Authority in Guernsey, whose contact details are as follows:

St Martin's House, Le Bordage, St Peter Port, Guernsey, GY1 1BR
+44 (9) 1481 742 074
enquiries@odpa.gg
www.odpa.gg

14.4 You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

14.5 We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

15 **Changes to this privacy notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.