



TRUSTEES LIMITED
FUND SERVICES LIMITED

DATA PROTECTION PRIVACY STATEMENT

Jupiter is committed to protecting the privacy and security of your personal information.

This Privacy Statement describes how we collect and use personal information about you and what your data protection rights are, in accordance with the Data Protection (Bailiwick of Guernsey) Law 2017.

It applies to all Clients, individuals connected to Managed Clients or prospective clients.

Effective Date: 25 May 2018

The Jupiter Group (“**Jupiter**”, “**the Group**”, “**we**”, “**us**” or “**our**”) comprises the following companies; each of their associates and affiliates; and each of their employees, officers and directors:

- Jupiter Trustees Limited
- Jupiter Fund Services Limited
- Jupiter Directors One Limited
- Jupiter Directors Two Limited
- Jupiter Nominees Limited
- Jupiter Secretaries Limited

“**Client**” means addressee(s) of our Engagement Letters and, in the case of an individual, includes his heirs, personal representatives and permitted assigns.

“**Engagement Letter**” means a letter issued by Jupiter and signed by the Client which will incorporate the Terms and Conditions and also includes any administration agreement or equivalent entered into in addition to or instead of an Engagement Letter.

“**Managed Client**” means any trusts, companies, foundations, partnerships, pension schemes and other incorporated or unincorporated entities or other person in respect of which Services are provided.

“**Services**” means all services carried out or performed for or on behalf of, in connection with (whether before or after its establishment) any Managed Client by Jupiter, including without limitation the formation, management and/or administration of trusts, companies, foundations, partnerships, pension schemes and other incorporated or unincorporated entities and the provision to any Managed Client of registered offices, resident agents, trustees, protectors, enforcers, directors, secretaries, nominees and other officers and any other activities which are incidental thereto; any other services as agreed with the Client.

“**Terms and Conditions**” means the terms and conditions issued by Jupiter and as amended from time to time.

Jupiter is a "**data controller**". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this Privacy Statement.

This Statement does not form part of any contract to provide services. We may update this Statement at any time.

It is important that you read this Statement, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. This includes but is not limited to, your name, previous or former names, personal contact details including addresses, telephone numbers and email addresses, date of birth, place of birth, gender, marital status, details of family relationships, identity verification documentation, address verification documentation, tax identification numbers, residence, tax residence, domicile, occupation & employment details, source of wealth details, source of funds details and bank account details. It does not include data where the identity of the person has been removed (anonymous data).

There are "**special categories**" of more sensitive personal data which require a higher level of protection. These include information regarding race, health, genetic information and biometric data, religious beliefs, sexual orientation, criminal convictions and political opinions.

Generally we do not hold any special categories of personal data on Clients or individuals connected to Managed Clients.

How is your personal information collected?

We process information that you provide directly and information learned about you from communications and dealings with you. This will either be face to face, received physically by post or fax or electronically by email.

We also obtain some information about you from others, as set out below:

From Clients:

The Client or prospective client is the usual source of information. The individual or prospective client may be based in the EU or outside the EU. Processed information may include your name, company, title and job description and contact details such as email address and telephone number or business address, as well as passport information, details of

family relationships, banking relationships, financial and tax status, business and other affairs, source of wealth, source of funds and interests or connections to any Managed Client or any other trusts, companies, foundations, partnerships, pension schemes and other incorporated or unincorporated entities.

From advisers, intermediaries, introducers, service providers and third parties:

From professional advisers, intermediaries, introducers and third parties both inside and outside the EU with whom the Client, Managed Client of the Jupiter Group has a business relationship. Processed information may include your name, company, title and job description and contact details such as email address and telephone number or business address, as well as passport information, details of family relationships, banking relationships, financial and tax status, business and other affairs, source of wealth, source of funds and interests or connections to any Managed Client or any other trusts, companies, foundations, partnerships, pension schemes and other incorporated or unincorporated entities.

Public sources:

Sources both inside and outside the EU, such as news outlets, websites and other media sources, international sanctions lists, any publically available databases or other data sources and screening services. Processed information may include your name, company, title and job description and contact details such as email address and telephone number or business address, as well as passport information, details of family relationships, banking relationships, financial and tax status, business and other affairs, source of wealth and source of funds.

Other Sources:

Any research agencies who may carry out research for us both inside and outside the EU.

How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in one or more of the following circumstances:

1. Where we need to perform the contract or agreement (Engagement Letter) we have entered into with a Client in order to carry out our Services.
2. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
3. Where we need to comply with a legal obligation.
4. Where you have provided your express consent by completing forms.

We may also use your personal information to protect your vital interests (or someone else's interests) but this is likely to be rare.

We have determined that consent is not required for processing of personal data held for Clients and individuals connected to Managed Clients or their related ownership structures. The collection of this personal data has been determined to be as part of the Jupiter Group's ordinary course of business and is necessary for the purposes of the legitimate interests of the Jupiter Group as a Controller and the advisers, intermediaries, introducers, service providers and third parties with whom the Managed Client or the Jupiter Group have a business relationship. Where possible Consent will be obtained through the collection of personal data using application forms.

If you do not provide personal data that we require to provide our Services, then we may be unable to provide the Client with the services and may need to terminate any contractual or fiduciary relationship with the Client.

What we use the information for

We may collect, use, process and disclose your data for the following reasons:

Where the processing is necessary for us to perform a contract:

- For the performance of Services to a Managed Client.
- To take pre-contract measures you request to assess your needs in relation to specific products or services.

Where necessary for our legitimate interests (as listed here):

- To provide the Services to a Managed Client and to communicate with you about these Services.
- We may be directed not to inform certain people that they are beneficiaries under a trust and may process beneficiary personal data to be able to contact, identify, and distribute the trust fund to these beneficiaries after the Client's life, without informing these beneficiaries during the Client's life.
- To manage and administer our business.
- To manage and improve relationships with you and assist with Client management.
- To record telephone conversations with you, to retain your picture, record video footage, and to keep samples of your signature or handwriting for authentication purposes.
- Under directions or at the request of a Client or when we may exercise our discretion for a Managed Client to establish and maintain a relationship with a financial institution, law firm, advisor, service provider, family officer, security issuer or company.

- To help detect, prevent, investigate, and prosecute fraud and/or other criminal activity, and share this data with our legal, compliance, risk and managerial staff to assess suspicious activities.
- To manage and ensure the security of our IT systems.
- To disclose information to, and comply with instructions of, relevant governmental entities, regulatory authorities, tax authorities or other intermediaries, counterparties, courts, auditors or other third parties.
- To determine our legal rights and duties, and to prepare documentation in relation to a Managed Client.
- To make applications for protective orders or directions to courts or to establish, exercise or defend legal claims and in order to protect and enforce our rights, property, or safety, or to assist Clients or others to do this.
- To investigate and respond to any complaints about us and to help maintain service quality and train staff to deal with complaints and disputes.
- To conduct compliance activities such as audit and reporting, assessing and managing risk, maintenance of accounting and tax records, fraud, countering the financing of terrorism and anti-money laundering (CFT / AML) prevention and measures relating to sanctions, anti-terrorism laws and regulations and fighting crime. This includes know your customer screening (which involves identity checks and verifying address and contact details); screening of politically exposed persons (which involves screening client records against internal and external databases to establish connections to 'politically exposed persons or PEPs); sanctions screening (which involves the screening of clients details against published sanctions lists); and exchanging personal contact information, source of wealth data, source of funds data, address verification and identity verification, and other personal data, with an account carrier to open and maintain a bank account, investment or brokerage account or with other financial institutions, advisers, intermediaries, introducers, service providers and third parties.
- For compliance with duties under any applicable laws, including trust law, company law, partnership law, foundation law, pension rules and regulations, securities law and tax act in any jurisdiction.

Where required by Guernsey, European Union (EU), or EU Member State, or other applicable or equivalent laws:

- To disclose information to governmental entities or regulatory authorities, tax authorities, financial markets, banks, brokers, advisers, service providers, introducers or other intermediaries or counterparties, courts or other parties.

Where you consent to the processing of personal data:

- To the extent required to allow us to process personal data of a minor child such as where a child is named as a trust beneficiary.
- Otherwise to the extent that consent for the processing of personal data is required under applicable law.
- We may ask you to agree that you have received this Privacy Statement and that you agree to each and every individual data processing activity and reasons set out in this Privacy Statement.

Where necessary to protect your or a relevant third party's vital interests.

- Where necessary to protect an interest which is essential for the life of a Client or relevant third party such as to invest, administer, and distribute assets according to a trust instrument for the care of a Client suffering disability, illness or injury, or for a minor or disabled beneficiary.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent in the provision of Services to the Managed Client, or in compliance with the above rules, where this is required or permitted by law or where we are required to process, retain or maintain the confidentiality of personal information in order to exercise a power or discretion or perform a duty under a trust arrangement.

Special categories of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. Generally we do not hold special categories of personal data on Clients or individuals connected to Managed Clients.

However we have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations.
3. Where it is needed in the public interest.

Less commonly, we may process this type of information where it is needed in relation to legal proceedings or where it is needed to protect your vital interests (or someone else's vital

interests) and you are not capable of giving your consent, or where you have already made the information public.

Automated decision-making

We do not envisage that any decisions will be taken about you using fully automated means, however we will notify you in writing if this position changes.

Data sharing

We will share your personal information with third parties where required in order to provide Services to Managed Clients, by law or where we have another legitimate interest in doing so.

In particular, we may disclose your personal data to others as follows:

Internal Third Parties:

- Other companies in the Jupiter Group and their officers, management and staff.

External Third Parties:

- Service providers including those providing banking, investment management, brokerage, registered office and / or resident agent services, accounting services, insurance, property management, IT, payroll and system administration services.
- Professional advisers including lawyers, tax advisers, financial advisers, auditors and insurers who provide consultancy, legal, tax, financial, insurance and accounting services.
- Global authorities including any competent regulatory, prosecuting, tax or governmental or judicial body or authority, courts or other tribunals in any jurisdiction.
- Successor third parties in connection with a change of administration for a Managed Client, ownership or ownership of any assets.

All our third-party service providers and other entities in the Jupiter Group are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions. Where possible contractual arrangements are in place or otherwise we rely on their own policies and procedures.

Transferring information outside the EU

Normally we will only transfer your data to a country where there is an adequacy decision by the European Commission in respect of those countries. This means that the countries to

which we transfer your data are deemed to provide an adequate level of protection for your personal information.

Where we propose to transfer your data to a country that does not have an adequacy decision, we will ensure that your personal information is protected through the use of appropriate contractual terms.

Data retention

We shall keep your personal data for as long as is required in order to fulfil contractual and fiduciary obligations to you, and for such other suitable period reflecting the applicable retention laws, regulations and limitation periods to which the Jupiter Group is subject. After your lifetime, any residual privacy rights are abandoned and waived to the extent permitted by law. Where personal data is processed solely with your consent, it shall be processed until you ask us to stop, and for a reasonable period afterwards to allow us to comply with your request, unless another legal justification permits continued processing.

Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (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. 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.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to 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 below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. 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.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

Please note that we may decline to comply with any request to delete or restrict the use of your information if we still require that information for any legal or contractual reasons.

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 the DPO. 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.

The withdrawal of consent shall not affect the lawfulness of processing for other reasons and based on other grounds where this is permitted under applicable law.

Data protection officer / Data protection authority

We have appointed a data protection officer (**DPO**) to oversee compliance with this Privacy Statement. If you have any questions about this Statement or how we handle your personal information, please contact the DPO using the contact details below. You have the right to make a complaint at any time to the Data Protection Authority, the Guernsey supervisory authority for data protection issues.

Changes to this Privacy Statement

We reserve the right to update Privacy Statement at any time, and we will ensure that any update to this Statement is made available on our website www.jupiter.gg. We encourage you to regularly review this Statement to ensure that you are always aware of how personal information is collected, used, stored and disclosed. We may also notify you in other ways from time to time about the processing of your personal information.

Data Protection Laws

This Privacy Statement is based on EU and Guernsey law. These data protection laws may not apply if:

- You do not receive services from the Jupiter Group in Guernsey, the EU or the EEA;
- You are not resident or located in these jurisdictions while receiving services; and
- Your personal data is processed outside these jurisdictions.

If you have any questions about this Privacy Statement, please contact the Data Protection Officer by email to info@jupiter.gg or in writing at PO Box 344, Mont Crevelt House, Bulwer Avenue, St. Sampson, Guernsey, GY1 3US

Registered Office address: Mont Crevelt House, Bulwer Avenue, St Sampson, Guernsey GY2 4LH.

Jupiter Trustees Limited is licensed and regulated by the Guernsey Financial Services Commission to conduct fiduciary business. Registered in Guernsey Company Number 28822.

Jupiter Fund Services Limited is licensed and regulated by the Guernsey Financial Services Commission to conduct controlled investment business. Registered in Guernsey Company Number 56465.

April 2019

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