



Belasko's Privacy Policy is set out below in the following clauses:

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If you have any questions about this Privacy Policy or how we handle your personal information (e.g. our retention procedures or the security measures we have in place), or if you would like to make a complaint, please contact [info@belasko.com](mailto:info@belasko.com).

### 1. DEFINITIONS

The following terms have the following meanings:

- "Belasko", "we" and "us" means any or all of the entities listed on the "**Regulatory Notices**" page of our website and "**our**" shall be construed accordingly.
- "Client" means either:
- (a) any person including any of a person's personal representatives, executors, heirs, administrators or successors in title receiving services from Belasko; or
  - (b) means any company, trust, foundation or limited partnership (or other entity of any type, whether or not having legal personality and wherever situated) to which Belasko provide a service.
- "you" means any individual whose personal data we collect, hold and process in the course of operating our business and our website and "your" shall be construed accordingly.

### 2. INTRODUCTION

This Privacy Policy sets out how Belasko deals with your personal data which we collect in the course of you and other individuals and entities connected with you interacting with Belasko and/or our Clients and/or using our website. We take privacy and security of your information seriously and will only use such personal information as set out in this Privacy Policy and in ways which are reasonably ancillary to what is set out below.

### 3. THE PERSONAL INFORMATION WE PROCESS

3.1 We may collect various types of personal data about you, including:

- (a) Your identification information (which may include your name, copies of your ID card and passport, details of your nationality, place and date of birth, gender, photograph and/or IP address and personal data relating to any claims, court cases and/or convictions relating to you, whether you are a politically exposed person (**PEP**), any personal data available in the public domain and such other information as may be necessary for Belasko (and/or its Client) to provide their services, undertake their business, complete their anti money laundering and counter financing of terrorism (**AML/CFT**) process and discharge their legal and regulatory obligations (including but not limited to, their AML/CFT obligations);
- (b) Your tax status information (which may include your tax residency, tax ID, tax status);
- (c) Your contact information (which may include postal address, e-mail address and your home and mobile telephone numbers);
- (d) Your family and other relationships (which may include your marital status, the identity of your spouse and the number of children that you have together with information about other personal and professional relationships);
- (e) Your professional and employment information (which may include your level of education and professional qualifications, your employment, employer's name and details of directorships and other offices which you may hold); and/or
- (f) Your financial information (which may include details of your assets, sources of funds, sources of wealth, shareholdings and your beneficial interest in assets, your bank details and your credit history).



- 3.2 We may also collect and process personal data regarding people connected to you, either by way of professional (or other) association or by way of family relationship.

#### 4. WHERE WE OBTAIN YOUR PERSONAL INFORMATION

We collect your personal information from the following sources:

- (a) information which you give to us, including but not limited to:
  - (i) such other forms and documents as we may request that are completed in relation to the administration/management of any of our services that we provide to you or any Client;
  - (ii) information gathered through client due diligence carried out as part of our compliance (or the compliance of any Client we provide services to) with regulatory requirements; or
  - (iii) any personal information provided by way of correspondence with us by telephone, e-mail or otherwise;
- (b) information we receive from third party sources, including but not limited to:
  - (i) any Client;
  - (ii) your employer (or any person you are engaged by or for whom you act);
  - (iii) entities in which you or someone connected to you has an interest;
  - (iv) your, or your employers, advisors (tax, legal, financial or otherwise);
  - (v) other financial institutions who hold and process your personal information; and
  - (vi) credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; and
- (c) information received in the course of dealing with advisors, regulators and any official authorities.

#### 5. WHY WE COLLECT YOUR PERSONAL INFORMATION

5.1 We may hold and process your personal information on the following **lawful grounds**:

- (a) the processing is necessary for our legitimate interests, provided your interests and fundamental rights do not override those interests;
- (b) the processing is necessary to comply with our contractual duties;
- (c) the processing is necessary to comply with our legal and regulatory obligations;
- (d) (on exceptional occasions) where we have obtained your consent to processing your personal information for a specific purpose; and
- (e) on rare occasions, where it is needed in the public interest.

5.2 Pursuant to paragraph 5.1 above, your personal information may be processed for the purposes set out below (the **Purposes**):

- (a) Any purpose in connection with the provision of Belasko's services and any purpose ancillary to the provision of Belasko's services including, without limitation:
  - (i) management of any client (or prospective client) of Belasko; and/or
  - (ii) communicating with you;
  - (iii) performing (or any client of Belasko performing) appropriate anti money laundering / countering the financing of terrorism checks and procedures;
  - (iv) to ensure any client of Belasko or Belasko complies with a legal or regulatory obligations;
  - (v) management of suppliers of Belasko or any Belasko client; and/or
  - (vi) Monitoring and recording telephone and electronic communications and transactions (for (aa) quality, business analysis, training and related purposes in order to improve service delivery and (bb) investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act));
- (b) otherwise in connection with the business of any Client and/or Belasko's business including, without limitation:
  - (i) liaising with or reporting to any regulatory authority (including tax authorities) with whom any Client or Belasko are required to cooperate or report to, or with whom we decide or deem it is appropriate to cooperate;
  - (ii) to enforce or defend our legal and contractual rights or those of third party;
  - (iii) in connection with marketing and/or business development and/or know how;



- (iv) credit control and debt management;
- (v) analysis of Belasko's business, generation of internal reports and accounts; and/or
- (vi) assessment of legal and financial risks.

## 6. SHARING PERSONAL INFORMATION

6.1 We may share your personal information with:

- (a) any Client with whom you are associated (or will be associated with);
- (b) any other entity in the Belasko group of companies;
- (c) Belasko Group Limited and its controllers and owners;
- (d) any employee(s), officer(s), director(s), manager(s), contractor(s), consultant(s), advisor(s) or agent(s) personnel, subcontractors or any other parties who facilitate the business of any of the parties named at (a), (b) and (c) (above);
- (e) any regulated financial institution (bank or investment adviser) that provides (or may provide) a service to any of the parties named at (a), (b) and (c) (above);
- (f) any government authority or regulator of any of the parties named at (a), (b) and (c) (above); and/or
- (g) any other relevant third parties in the proper performance of the services.

6.2 Where we share your information with recipients outside the European Economic Area and/or the United Kingdom, Jersey and/or Guernsey, we require the recipients of that personal information to put in place adequate measures to protect it, including by entering into appropriate data transfer agreements such as the EU standard contractual clauses. If you would like further information about the safeguards we have in place to protect your personal information, please contact [info@belasko.com](mailto:info@belasko.com).

## 7. RETENTION OF PERSONAL INFORMATION

Your personal information will be retained for as long as required:

- (a) for the purposes for which the personal information was collected;
- (b) in order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
- (c) as required by data protection laws and any other applicable laws or regulatory requirements.

## 8. ACCESS TO AND CONTROL OF PERSONAL INFORMATION

8.1 You have the following rights in respect of the personal information about you that we process:

- (a) the right to access and port personal information;
- (b) the right to rectify personal information;
- (c) the right to restrict the use of personal information;
- (d) the right to request that personal information is erased; and
- (e) the right to object to processing of personal information.

8.2 You also have the right to lodge a complaint about the processing of your personal information either with us or:

- (a) with the Office of the Information Commissioner in Jersey (<https://oicjersey.org>) in connection with Belasko entities located in Jersey.
- (b) with the Office of the Data Protection Authority in Guernsey (<https://odpa.gg>) in connection with Belasko entities located in Guernsey;
- (c) with the Information Commission (<https://ico.org.uk/>) in connection with Belasko entities located in the UK; and
- (d) with the National Commission for Data Protection (<https://cnpd.public.lu/>) in connection with Belasko entities located in Luxembourg.

8.3 Where we have relied on consent to process your personal information, you have the right to withdraw consent at any time. Should you withdraw consent at any time, it may impact our ability to provide our services.

8.4 If you wish to exercise any of the rights set out in this paragraph, please contact [info@belasko.com](mailto:info@belasko.com).

## 9. INACCURATE OR AMENDED INFORMATION

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon Belasko's (or any Client's) ability to provide its services.