



## THE INTERNATIONAL FAMILY OFFICE

Strictly Private & Confidential

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### STONEHAGE FLEMING GROUP PRIVACY NOTICE

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MARCH 2018

## PRIVACY NOTICE

This Privacy Notice explains how Stonehage Fleming Family and Partners Limited (“the Company”), **with regard to its website**, 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 the Company.

The Company is the data controller of your personal data and is subject to the Data Protection (Bailliwick of Guernsey) Law 2007 (“DPL”) Our Group Data Protection Officer can be contacted at [groupdataprotectionofficer@stonehagefleming.com](mailto:groupdataprotectionofficer@stonehagefleming.com)

We may amend this Privacy Notice from time to time, to reflect any changes in the way that we process your personal data. This Privacy Notice supersedes any previous version of it which you may have had sight of.

### 1. YOUR RIGHTS

Under the DPL 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; and
- To require us not to send you marketing communications.
- To require us to erase your personal data;
- 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.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply.

You can find out more about your rights under data protection legislation at [www.dataaci.gg](http://www.dataaci.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 our DPO using the following:

[groupdataprotectionofficer@stonehagefleming.com](mailto:groupdataprotectionofficer@stonehagefleming.com)

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 Commissioner [www.dataaci.gg](http://www.dataaci.gg).

### 2. HOW WE COLLECT YOUR DATA

You are not required to provide any personal information on the Website other than entering your username and password to access secure parts of the Website. However, you may choose to provide further personal information when contacting us or when requesting marketing material.



### 3. THE CATEGORIES OF THE DATA WE COLLECT

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

- Your contact details and why you would like us to contact you,
- What types of marketing material you would like to receive and the means by which you wish to receive it,
- Where you have been granted access to protected parts of our website, your log in information.
- Technical information including the internet protocol (IP) address used to connect your computer to our website. An IP address is an assigned number similar to a telephone number, which allows your computer to communicate over the internet ; and
- Information about your visit to our website, including items you searched for and length of time spent on pages.

### 4. THE BASIS FOR PROCESSING YOUR DATA, 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 which you are a party or in order to take steps at your request prior to entering into a contract.

- In this respect, we use your personal data for the following:
  - To prepare a Proposal for you regarding the services we offer;
  - To deal with any complaints or feedback you may have;
  - For any other purpose for which you provide us with your personal data.
- In this respect, we may share your personal data with the following:
  - Your advisers,
  - Our advisers where it is necessary for us to obtain their advice or assistance;
  - Our data storage providers.

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

- In this respect, we may use your personal data for the following:
  - For the administration and management of our business;
  - Seeking advice on our rights and obligations, such as where we require our own legal advice;
- In this respect we may share your personal data with the following:
  - Our advisers or agents where it is necessary for us to obtain their advice or assistance;
  - With third parties and their advisers where those third parties are acquiring, or considering acquiring, all or part of our business.



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

- In this respect, we may use your personal data for the following:
  - To meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws.
- In this respect, 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 relevant regulators or law enforcement agencies where we are required to do so.

## 5. WHERE WE NEED YOUR CONSENT TO PROCESS YOUR DATA

Where you have indicated that you wish to receive marketing material, we may send to you marketing material of the type you have indicated via the methods you have selected. Where you wish to withdraw it at any time, you may do so using the unsubscribe facility which is provided with all marketing material. You may also, if you wish to withdraw your consent, contact our Group Data Protection Officer at [groupdataprotectionofficer@stonehagefleming.com](mailto:groupdataprotectionofficer@stonehagefleming.com)

## 6. SAFEGUARDS

We safeguard the personal information you provide to us by centralising data storage in a secure environment, controlling access by employees, using consistent configuration and monitoring of the IT environment, using a selection of tools to ensure timely response to vulnerabilities identified by software vendors. Thus, for example, we have in place active firewall management, centrally managed anti-virus and malware software and ongoing vulnerability assessments.

## 7. SHARING OF DATA WITHIN THE GROUP

We may need to transfer your personal information to other Group companies which provide the same or a similar level of protection for your personal data as is provided within Guernsey. We may also share your personal data with Group companies located in countries which do not have laws which provide the same level of protection to your personal data as are provided by Guernsey. However, these companies are subject to our Group-wide data sharing arrangements which offer a common level of protection across the Group.

## 8. RETENTION OF YOUR DATA

We will retain your personal information for as long as necessary and permitted for legal, regulatory, and legitimate business purposes. After this period, your personal data will be destroyed.

### **Other Websites**

This website may contain links to other sites of third parties. We are not responsible for the content or privacy practices of those other sites.

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