

INTRODUCTION

This notice (Privacy Notice) applies to personal information held by the Trustee and other members of the group of companies of which it is a member (Trustee Group) as data controllers, as described below. It explains what information we collect about you, how we'll use that information, who we'll share it with, the circumstances when we'll share it and what steps we'll take to make sure it stays private and secure.

Terms defined in the application form for a Sub-Trust also apply to this Privacy Notice.

This Privacy Notice covers any the services provided by members of the Trustee Group. Wherever we've said 'you' or 'your', this means you, any authorised person on your account, anyone who deals with us for you eg. trustees or executors, attorneys under a power of attorney and other related people. When we say 'we', we mean Trustee Group companies which act as a data controller in respect of your personal data. Unless otherwise stated below, the data controller for the purposes of this notice is Fiduchi Trustees Limited.

If you have any questions about this privacy notice, please email us at service@axonicinternational.com.

This Privacy Notice may be updated from time to time and the most recent version can be found at www.axonicinternational.com.

IT IS IMPORTANT THAT THE PERSONAL DATA WE HOLD ABOUT YOU IS ACCURATE AND CURRENT. PLEASE KEEP US INFORMED IF YOUR PERSONAL DATA CHANGES DURING YOUR RELATIONSHIP WITH US.

1. The data we collect about you

We'll only collect your information in line with Applicable Law. We may collect it from a range of sources. Information that you provide to us, includes:

- personal details, e.g. name, previous names, gender, date and place of birth;
- contact details, e.g. address, email address, landline and mobile numbers;
- information concerning your identity e.g. photo ID, passport information, social security number, National ID card and nationality;
- information regarding your family members or other third parties who may benefit from a Sub-Trust.

Information we collect or generate about you, includes:

- your financial information and information about your relationship with us, including your ways of interacting with us;
- information we use to identify and authenticate you, e.g. your signature and your biometric information, such as your voice for voice ID, or additional information that we receive from external sources that we need for compliance purposes;
- information included in documentation provided to beneficiaries and authorised intermediaries;
- investigations data, e.g. due diligence checks, sanctions and anti-money laundering checks, external intelligence reports, content and metadata related to relevant exchanges of information between and among individuals and/or organisations, including emails, voicemail, etc.;
- information that we need to support our regulatory obligations, e.g. information about transaction details, detection of any suspicious and unusual activity and information about parties connected to you or these activities;
- information from third party providers, e.g. information that helps us to combat fraud;
- information which arises out of an Application or a Sub-Trust;
- information from other parties involved in a Sub-Trust;
- information from publicly available sources.

2. How we use your Personal Data

We will only use your Personal Data where we have your consent or a lawful reason for using it in accordance with Applicable Law. These reasons include:

- to pursue our legitimate interests;
- to process the information to enter into or carry out the agreement we have with you;
- to process the information to comply with a legal obligation;
- where we believe the use of your information as described is in the public interest, e.g. for the purpose of preventing or detecting crime;
- to establish, exercise or defend our legal rights.

The reasons we use your information include:

- to provide services in connection with a Sub-Trust;
- to carry out your instructions;
- to manage our relationship with you;
- to prevent or detect crime including fraud and financial crime, e.g. financing for terrorism and human trafficking;
- to ensure security and business continuity;
- to manage risk;
- to protect our legal rights and comply with our legal obligations; and
- to correspond with third party intermediaries.

Your Personal Data will not be used for marketing purposes unless you have given your consent.

3. Disclosures of your Personal Data

We may share your Personal Data information with others where lawful to do so including where we or they:

- need to in order to provide you with services you've requested;
- have a public or legal duty to do so, e.g. to assist with detecting and preventing fraud, tax evasion and financial crime;
- need to in connection with regulatory reporting, litigation or asserting or defending legal rights and interests;

- have a legitimate business reason for doing so, e.g. to manage risk, verify your identity, enable another company to provide you with services you've requested, or assess your suitability for products and services;
- have asked you for your permission to share it, and you've agreed.

We may share your information for these purposes with others including:

- other Trustee Group companies and any sub-contractors, agents or service providers, including Axonic International LLC and its affiliates, who work for us or provide services to us or other Trustee Group companies (including their employees, sub-contractors, service providers, directors and officers);
- any joint holders, trustees or executors, beneficiaries, intermediaries and financial institutions, tax authorities, credit reference agencies, payment service providers;
- any issuer relevant to an Investment Plan or beneficiaries under a Sub-Trust;
- any people or companies where required in connection with potential or actual corporate restructuring, merger, acquisition or takeover, including any transfer or potential transfer of any of our rights or duties under our agreement with you;
- law enforcement, government, courts, dispute resolution bodies, our regulators, auditors and any party appointed or requested by our regulators to carry out investigations or audits of our activities;
- fraud prevention agencies who'll also use it to detect and prevent fraud and other financial crime and to verify your identity;
- anyone who provides instructions or operates Investment Plans on your behalf, e.g. financial intermediaries;
- anybody else that we've been instructed to share your information with by either you, a joint holder or anybody else who provides instructions on your behalf.

4. International transfers

Your information may be transferred to and stored in locations outside Jersey, the UK and the European Economic Area (EEA), including countries that may not have the same level of protection for personal information. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. We may need to transfer your information in this way to carry out our agreement with you, to fulfil a legal obligation, to protect the public interest and/or for our legitimate interests. In some countries the law might compel us to share certain information, e.g. with tax authorities. Even in these cases, we'll only share your information with people who have the right to see it.

5. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions

and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

6. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider 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, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. Your legal rights

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.
- **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 us in writing.

No fee usually required

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

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

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 special purpose, you have the right to withdraw your consent for that special processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes to which you originally agreed, unless we have another legitimate basis for doing so in law.

Further information about your rights can be found by visiting <https://jerseyoic.org/>.