



## **ST. GEORGE'S GROUP LIMITED PRIVACY STATEMENT**

### **GENERAL**

This Privacy Statement (the “Statement”) is designed to explain how St. George’s Group Limited and its subsidiaries, St. George’s Trust Company Limited, St. George’s Services Limited, and St. George’s International Limited (together referred to as the “Group”) collect, use, share and store the information we collect in the course of operating our trust and corporate services businesses. As a Group, we are committed to protecting your privacy and processing the information you provide to us in a safe and secure fashion.

### **THE INFORMATION COVERED BY THIS STATEMENT**

In the course of our business relationships, we may collect various types of personal information regarding you, your family, and your business interests, which may include but not be limited to the following:

- Your personal information (full legal name, date and country of birth, marital status, home and business addresses, contact information, passport information, taxpayer identification information, information relating to past investigations and convictions, politically exposed person status, and such other information about you as may be available in the public domain);
- Personal information (as above) relating to your spouse and children;
- Details regarding your employment and/or business interests;
- Financial information (source of wealth and source of funds, the identity of your professional advisors, details regarding legal and beneficial ownership of different assets, banking information, etc.); and
- Such other relevant personal information as may be required by the Group from time to time in order to discharge its legal and regulatory duties.

### **HOW WE OBTAIN INFORMATION ABOUT YOU**

The vast majority of the information we collect and retain is provided to us directly by you (or your parent or legal guardian in the event that you are a minor) in the form of client questionnaires, customer due diligence documents, email correspondence, and telephone correspondence. In certain cases, it may be necessary for us, in order to discharge our legal or regulatory duties, to obtain information about you, your family and your business interests from other sources, such as financial crime and sanctions databases, the internet, your professional advisors, and the financial institutions with which you do business.

### **HOW THE GROUP USES INFORMATION**

The Group, through its operating subsidiaries, provides trust administration services in Bermuda and corporate administration services in Bermuda and the Cayman Islands. The personal data we collect from you is required in order that we may discharge our regulatory obligations and provide you with the trust and corporate administration services you require. In addition to using your information in the course of our day-to-day dealings with you, your family and your businesses (as applicable), it may also be necessary for us to use or provide certain personal information to third parties in the following contexts:

- To respond to customer due diligence requests from third party service providers which provide professional or financial services to the trusts or businesses we administer (including without limiting the generality of the foregoing banks, investment advisors, fund administrators, asset managers, lawyers, accountants, brokers, real estate agents and dealers in high value goods);
- To comply with requests for information from regulatory authorities, law enforcement agencies, or government officials;
- To comply with our legal obligations to exchange account and taxpayer identification information under tax information exchange agreements to which Bermuda and the Cayman Islands are party from

time to time, the Common Reporting Standard (“CRS”), and the Foreign Account Tax Compliance Act (“FATCA”); and

- To such third party agents, suppliers, or contractors as are required by the Group in connection with our operations (such as IT and communications services providers, external auditors, accountants and external legal advisors which may be instructed from time to time).

Once you have received this Statement, you will be deemed to consent to the aforementioned uses of your personal information unless you notify us otherwise.

## **SECURITY AND RETENTION**

The Group has organisational measures in place to prevent the unauthorised or unlawful access to your personal information. In the event of a security breach leading to unauthorised access or disclosure of your personal information, we will inform you about the breach as soon as reasonably practicable after discovering the nature and extent of the breach.

We are obliged to hold your personal information for no less than the time periods stipulated by Bermuda and/or Cayman Islands law (as applicable) from time to time.

## **ACCESS, RECTIFICATION OF ERRORS AND DESTRUCTION OF DATA**

Subject to any legal or regulatory obligations we may have, you are entitled to ask for a copy of the personal information retained about you by the Group. In the event that the request is complex or requires significant effort or time on our part, a reasonable fee may apply to this exercise. You may make such a request by email to the Group’s Data Protection Officer at [compliance@st-georges.com](mailto:compliance@st-georges.com).

We are authorized by law to refuse to disclose your personal information in the following circumstances:

- The personal information is protected by legal privilege;
- The disclosure of the personal information would reveal confidential information about the Group or about a third party that is of a commercial nature;
- The disclosure of the personal information could reasonably be expected to threaten the life or security of an individual;
- The personal information would reveal personal information about another individual; and
- The personal information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his identity.

You also have the right to have any inaccuracies in your personal information corrected. We encourage you to ensure that your data and contact information is kept up-to-date, as inaccurate information may impair our ability to provide the best possible trust and corporate administration services to you.

Subject to any and all laws of Bermuda or the Cayman Islands (as applicable) which require us to retain your personal information for specified purposes and/or periods of time, you may request that we destroy copies of your personal information in our possession.

## **AMENDMENTS**

The Group may amend this Statement from time to time, and any such updates will be posted to the Group’s website ([www.st-georges.com](http://www.st-georges.com)). We last updated this Statement on 18 October 2018.

If you have any questions regarding the contents of this Statement, please contact the Group’s Data Protection Officer by email at [compliance@st-georges.com](mailto:compliance@st-georges.com).