

GENERAL

This Privacy Statement (the “Statement”) explains 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”, “we”, “us” or “our”) collect, use, share, store and otherwise process personal information in the course of operating our trust and corporate services businesses. As a Group, we are committed to protecting your privacy and to using your personal information lawfully, fairly and securely in accordance with the Personal Information Protection Act 2016 (“PIPA”) and any other applicable law.

WHO WE ARE AND HOW TO CONTACT US

The Group is established in Bermuda, with its principal office at 27 Reid Street, Hamilton HM 11. We have appointed a single Data Protection Officer (Kevin Gunther) for all Group entities with primary responsibility for our compliance with PIPA and for communicating with the Office of the Privacy Commissioner for Bermuda (“PrivCom”). You can contact him about this Statement, or about how we handle your personal information either by email (compliance@st-georges.com) or post (PO Box HM 3051, Hamilton HM NX).

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.

SENSITIVE PERSONAL INFORMATION

Some of the information we collect is “sensitive personal information” as defined in section 7 of PIPA. For example, your marital and family status and, where relevant to our duties, information about your physical or mental health. We use sensitive personal information only where we have lawful authority to do so, such as where you have consented, where use is required for legal or regulatory proceedings, or as otherwise permitted by PIPA. We will not use sensitive personal information to discriminate against any person contrary to the Human Rights Act 1981. We treat information about past investigations and convictions with particular care and use it only as necessary to discharge our customer due diligence and regulatory obligations.

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.

OUR PURPOSES AND LEGAL BASIS FOR USING YOUR INFORMATION

The Group, through its operating subsidiaries, provides trust administration services in Bermuda and corporate administration services in Bermuda and the Cayman Islands. We use your personal information for purposes including: providing those trust and corporate administration services; carrying out customer due diligence and ongoing monitoring; discharging our anti-money-laundering, anti-terrorist-financing, sanctions and other legal and regulatory obligations; meeting our tax-reporting obligations (including under the Common Reporting Standard (“CRS”) and the Foreign Account Tax Compliance Act (“FATCA”)); and the general administration of our relationship with you, your family and your business interests.

We rely on one or more of the following conditions under section 6 of PIPA when using your personal information:

- The use is necessary for the performance of a contract to which you are a party, or to take steps at your request before entering into a contract (s.6(1)(c));
- The use is required or authorised by law (s.6(1)(d)) — for example, our customer due diligence, sanctions-screening and tax-reporting obligations;
- The use is necessary in the context of an employment relationship with us (s.6(1)(h)), where applicable;
- Where you are a beneficiary of, or otherwise derive a benefit from, a trust or similar plan, you are deemed to consent to the use of your personal information for the purposes of coverage or enrolment under that plan (s.6(2)(d)); and
- Where none of the above applies, your consent (s.6(1)(a)), which you may withdraw at any time by contacting our Data Protection Officer.

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.

SHARING YOUR INFORMATION

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, CRS, and 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).

TRANSFERS OF YOUR INFORMATION OUTSIDE OF BERMUDA

Because we provide corporate administration services in the Cayman Islands, and are required to report to and exchange information with authorities and counterparties located outside Bermuda, your personal information may be transferred to overseas third parties. These may include our Cayman Islands office (located at the The Grand Pavilion Commercial Centre, Hibiscus Way, 802 West Bay Road, Grand Cayman KY1-1203, Cayman Islands), overseas regulatory and tax authorities (including in connection with CRS and FATCA), and overseas service providers (such as IT and communications providers, auditors and external advisers). We recognise that, where information is transferred to a country that does not provide a comparable level of protection and no other protective measures are in place, there may be additional risks to your information. You may ask our Data Protection Officer for further information about these transfers and the safeguards in place.

SECURITY

The Group has organisational measures in place to prevent the unauthorised or unlawful access, destruction, use, modification or disclosure to your personal information. If a breach of security leads to the loss, unlawful destruction, or unauthorised disclosure of or access to your personal information, and the breach is likely to adversely affect you, we will, without undue delay, notify the Privacy Commissioner and then notify you. Our notification will describe the nature of the breach, its likely consequences, and the measures we have taken or propose to take to address it, including, where appropriate, steps you can take to protect yourself. We keep a record of all personal-information breaches, whether or not they are notifiable.

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.

YOUR RIGHTS

Subject to any legal or regulatory obligations we may have, and to the exemptions available under PIPA, you have the right to:

- request access to the personal information we hold about you, together with the purposes for which it is used and the persons or types of persons to whom it has been disclosed;
- have inaccurate personal information corrected, or incomplete information completed;
- request that we block, erase or destroy your personal information in the circumstances permitted by PIPA; and
- withdraw any consent you have given, at any time.

To exercise any of these rights, please make a request in writing to our Data Protection Officer, setting out enough detail for us to identify the information concerned. We will promptly acknowledge your request and will respond within 45 business days. If your request is complex, or relates to a large volume of information, we may extend this period by up to a further 30 business days and will tell you why. We may ask you to verify your identity before we respond.

Where the law permits, a fee not exceeding the prescribed maximum may apply to a request for access to your personal information. We will not charge a fee where a request results in the correction of an error or omission in your personal information, or where we are prevented from charging a fee by our professional regulatory body.

In the limited circumstances permitted by PIPA, we may refuse all or part of a request — for example, where the personal information is protected by legal privilege; where disclosure would reveal confidential commercial information of the Group or a third party; where disclosure could reasonably be expected to threaten the life or security of an individual; where the information would reveal personal information about another individual; or where it would reveal the identity of someone who has provided an opinion in confidence and does not consent to disclosure. If we refuse a request, we will inform you of the reasons and of your right to make a complaint to PrivCom.

If you are not satisfied with how we have handled your personal information, you may make a complaint to the Office of the Privacy Commissioner for Bermuda.

RETENTION

We keep your personal information only for as long as is necessary for the purposes for which it is used, and in any event for at least the minimum periods required by Bermuda and/or Cayman Islands law (as applicable) from time to time.

AMENDMENTS

The Group may amend this Statement from time to time, and the current version will be published on the Group's website (www.st-georges.com). This Statement was last updated on 8 June 2026. We retain earlier versions of this Statement on record.

If you have any questions regarding the contents of this Statement, please contact the Group's Data Protection Officer as noted above.