

Privacy Statement

**Service defines us,
empowers you**

Introduction - Who Are We?

In this Privacy Statement, "Sanne", "we", "our" or "us" may refer to any or all of Sanne Group plc and its subsidiaries and affiliates (and their respective successors in title), which include the regulated entities listed on our website.

The contact details for our Global Data Protection Officer are set out below in Section 8.

The identity of the data controller for data protection purposes will vary depending on which jurisdiction your interaction with us occurs (as set out above).

What is this Privacy Statement?

In the course of providing various services to you or to someone connected with you, or in the course of providing services to or dealing with an entity by which you are employed (or in which you have an interest) or someone by whom you are employed or engaged, we may process your personal data – personal information relating to you from which you may be identified.

Sanne is bound to comply with EU data protection and privacy legislation, along with other applicable similar laws in other countries around the world. This Privacy Statement forms part of Sanne's obligation to be open and fair with all individuals whose personal data we process and to provide full information on how we process such personal data and what we do with it.

While EU data protection and privacy legislation applies only to EU residents, we believe everyone should have the same privacy rights regardless of where you live. So our privacy rights are available to all individuals.

If you receive services or products from Sanne, or you have specific interactions with us (for example, as a prospective employee), you may be provided with further privacy notices or statements which may be contained in a separate supplemental policy or within our terms and conditions of business. These additional privacy notices or statements shall supplement this Privacy Statement.

1. What personal data do we collect about you?

We collect and process a range of data about people we deal with and those connected to our clients and other counterparties. Such information might include:

- Your personal details, such as your:
 - Name;
 - Date of birth;
 - Occupation;
 - Nationality;
 - Marital status;
 - Country of residence;
 - Tax or social security identifiers;
 - Your profession, qualifications and employment history; and
 - Your home and/or professional address – for example, email address, postal address and/or telephone number.
- Identification documentation, such as copies of your passport, driving license, identification card or other documentation required by local law. Copies of these documents may include a photograph of you.
- Information provided through our recruitment process; please see our separate recruitment privacy statement for additional details.

- Details of your visits to our websites including, but not limited to, traffic data, location data and other communication data, and the resources that you access see our cookie policy for further details about what information we collect when you use our websites and other online resources.
- Details of your visits to our premises.
- Details of people with whom you are connected, including your family, colleagues and others;
- Information regarding entities with which you are connected, including:
 - Your employer;
 - Your advisors;
 - Banking and other service providers; and
 - Entities in which you have an interest.
- Your marketing and other preferences; and
- Information which you provide to us in the course of corresponding with us.

We may also collect and process “special category” data in certain circumstances where we are required to for the purposes of our legal and/or regulatory obligations including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation. This may include information regarding your racial or ethnic origins, political opinion and affiliations or information relating to criminal records.

2. Where we obtain your personal data:

2.1. We primarily collect your personal data from the following sources:

2.1.1. from information which you or your authorised representative give to us, including but not limited to:

- a) information set out in any agreements entered into with us;
- b) such forms and documents as we may request that are completed in relation to the client take-on and our ongoing administration;
- c) client due diligence documentation as part of our regulatory requirements; and
- d) any personal data provided by you by way of correspondence with us by phone, email or otherwise.

2.1.2. personal data we receive from you or any third-party sources which may include:

- a) Entities in which you or someone connected to you has an interest;
- b) Your legal and/or financial advisors;
- c) Other financial institutions who hold and process your personal data to satisfy their own regulatory requirements;
- d) Credit reference agencies and financial crime databases for the purposes of complying with our regulatory requirements; and
- e) Including information collected via website (including cookies and IP addresses), emails (e.g. traffic headers for analysing patterns of network traffic and managing client relationships).

2.2. We may also collect and process your personal data in the course of dealing with advisors, regulators, official authorities and service providers by whom you are employed or engaged or for whom you act.

2.3. We are entitled to hold and process your personal data on the following lawful grounds:

- Where we are considering entering into a contract with you, for the purpose of concluding that contract and then performing that contract;
- To comply with legal and regulatory obligations;
- The processing is necessary for our legitimate interests provided your interests and fundamental rights do not override those interests;
- Where we have obtained your consent;

- Where we need to protect your vital interests (or someone else's interests); and/or
- Where it is needed in the public interest.

Some of the above grounds for processing described above will overlap and there may be several grounds which justify our use of your personal data.

Inaccurate or Amended Information

- 2.4. Please let us know if any of your personal data (including correspondence details) changes as soon as possible. Failure to provide accurate information or to update changed information may have a detrimental impact upon our ability to provide services, including the processing of any subscription or redemption instructions. Failure to provide information where the same is required for anti-money laundering or other legal requirements means that we may not be able to provide services on a timely basis (or at all).

Purposes of processing

- 2.5. Pursuant to paragraph 2.3, we may process your personal data, for the purposes set out below (“**Purposes**”). Those based wholly or partly on our legitimate interests are set out in paragraphs 2.5.1 - to 2.5.7 inclusive:

- 2.5.1. Facilitating the internal administration of entities we administer on behalf of clients;
- 2.5.2. In order to carry out obligations arising from any agreements you entered;
- 2.5.3. Conducting financial screening, processing “customer due diligence”, source of funds information and verification data under applicable anti-money laundering and terrorist financing laws and regulations;
- 2.5.4. Communicating with you as necessary in connection with the provision of administration and other services or to answer your requests;
- 2.5.5. Operating IT systems, software and business applications;
- 2.5.6. Supporting our Technology teams, accounting, legal, reporting, internal audit and risk management, administrative, transfer, document storage, record keeping and other related functions;
- 2.5.7. Monitoring and recording electronic, telephone and other means of communications, transactions and physical security (including CCTV):
 - a) for quality, business analysis, training and related purposes in order to improve service delivery; and
 - b) for investigation and fraud prevention purposes, for crime detection, prevention, investigation and prosecution of any unlawful act (or omission to act);
- 2.5.8. Disclosing your personal data (including your identity) to any bank or third party financial institution;
- 2.5.9. To enforce or defend our rights, or those of third parties to whom we each may delegate responsibilities or rights in order to comply with a legal or regulatory obligations imposed on each of us; and
- 2.5.10. Liaising with or reporting to any regulatory authority (including tax authorities) with whom we either are:
 - a) required to cooperate with, report to; and/or

- b) with whom we decide or deem appropriate to cooperate.

We will only use your personal information for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

- 2.6. To the extent that such personal data contains special category data such as, for example: data relating to racial or ethnic origin, political opinion, religious or philosophical belief, trade union membership or criminal data then the processing of such data shall generally be for the purpose of complying with any right or duty imposed on us (or on any service provider appointed by us) by an enactment including, but not limited to, legislation and regulatory obligations relating to Anti-Money Laundering and Combatting the Financing of Terrorism and all other related legislation.

3. Sharing personal data

- 3.1. We may share your personal data within Sanne under the terms of any appropriate delegation or contractual arrangement. Those group companies may, in turn, process your personal data abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. Where such entities act as data processors, we will ensure that there are appropriate safeguards in place. Where such entities act as data controllers, they will be under an obligation to process your personal data in accordance with the law.
- 3.2. Data processing (as described above) may be undertaken by an entity who is located outside the European Economic Area including but not limited to: The Island of Jersey / The Bailiwick of Guernsey.
- 3.3. This means that, under the EU GDPR, the country or countries to which we transfer your data may not be recognized as having Adequacy status. However, to ensure that your personal data does receive an adequate level of protection, we have put in place organizational and technical measures that ensure an adequate level of protection of your personal data, such as the use of Standard Contractual Clauses approved by the European Commission.
- 3.4. We may also share your personal data with third parties (including our IT service providers, banks, financial institutions or other third-party lenders, auditors and legal professionals) under the terms of any appropriate delegation or contractual arrangement. Those authorized third parties may, in turn, process your personal data abroad and may have to disclose it to foreign authorities to help them in their fight against crime and terrorism. Where such entities act as data processors, we will ensure that there are appropriate safeguards in place. Where such entities act as data controllers, they will be under an obligation to process your personal data in accordance with the law.
- 3.5. For our core activities we are using following European-based IT service providers:
- Microsoft – Microsoft collaborative services, including email server hosting;
 - Barracuda – cloud backup and archiving solutions;
 - Mimecast – email services including email continuity and mail filtering gateway;
 - iLand – disaster recovery and cloud backup; and
 - Tessian – email services security and mail filtering gateway.

Please note that, depending on the service provided, we might use additional service providers. For further info, please contact your Sanne identified relationship owner.

4. Retention of personal data

4.1. Your personal data will be retained for as long as required:

- To fulfil the Purposes for which the data was collected;
- In order to establish or defend legal rights or obligations or to satisfy any reporting or accounting obligations; and/or
- As required by other applicable laws or regulatory requirements.

4.2. We endeavour to store your personal data securely in accordance with accepted market standards.

5. Securing personal data

5.1. The security of your personal data is important to us. We follow generally accepted standards to protect the personal data submitted to us, both during transmission and once it is received.

5.2. Whilst we have taken every reasonable care to ensure the implementation of appropriate technical and security measures, we cannot guarantee the security of your personal data over the internet, via email or via our websites nor do we accept, to the fullest extent permitted by law, any liability for any errors in data transmission, machine, software or operating error or any other cause.

5.3. Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Products, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

6. Access to and control of personal data

6.1. You have the following rights, under certain circumstances, in respect of personal data:

- Right to access and port personal data;
- Right to rectify personal data;
- Right to restrict the use of personal data;
- Right to request that personal data is erased;
- Right to object to processing of personal data;
- Right in relation to automated decision making and profiling; and
- Right to give instruction concerning the use of your data after your death.

We will respond to your request in a reasonable timeframe in accordance with applicable law.

6.2. Where we have processed personal data based on our legitimate interests, you have a specific right of objection. If you choose to do so, we may not be able to provide services to you.

6.3. You also have the right to lodge a complaint with the Office of the Data Protection Commissioner in Jersey (<https://oicjersey.org/>) or a Supervisory Authority of your usual residence or place of work or of the place of any alleged breach of data protection legislation.

Additional Information: If you choose to exercise any of your rights under the GDPR/CCPA/Data Protection Legislation, you have the right to not receive discriminatory treatment by us.

7. Right to withdraw consent

7.1. In limited circumstances we may approach you for your written consent to allow us to process your personal data – in particular where we are seeking to use special category data or to use data for another purpose.

7.2. Where you may have provided your consent to the collection, processing and transfer of your personal data for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Global Data Protection & Privacy Team. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

7.3. If you sign up to receive promotional materials from us via email and/or other electronic communications, we will use the data you give us to provide the communications you have requested. If you inform us that you wish to cancel email promotional materials by selecting “unsubscribe” at the bottom of such communication or by emailing us at marketingfunction@sannegroup.com, we will remove you from our mailing list.

8. Data Protection Officer

Sanne Group plc has appointed a global data protection officer to oversee compliance with this privacy notice. If you have any questions about this Privacy Statement or how we handle your personal data, please contact the Global Data Protection & Privacy Team. You have the right to make a complaint at any time.

9. How to contact us

If you have any questions about our use of your personal data, our retention procedures or our security processes, please contact our data protection officer at: dpo@sannegroup.com or at our global headquarters: Sanne, IFC 5, St. Helier, Jersey, JE1 1ST.

10. California Consumer Privacy Act (CCPA) addendum

10.1. Legal disclosures of CCPA

Sanne understands the importance of GDPR, however, Sanne also recognizes the importance of other applicable Privacy laws, in particular CCPA.

The CCPA part of Sanne’s Privacy Notice does not apply to Sanne’s personnel, job applicants, contractors, marketing, the personnel of our clients, instead it applies solely to California consumers.

10.2. CCPA Do Not Sell Rule

Sanne Does Not Sell your personal information under no circumstance.

10.3. Categories of Personal information under the California Consumer Privacy Act “CCPA”

All the following information “data” is collected from our users, customers, and/or business partners. Furthermore, types of individuals affected by the processing of below data is only Californian consumers in relation to Sanne (they can be employees, clients job applicants, contractors or other personnel) and this data will be further shared in line previously stated guidelines inside this Privacy Notice.

Category and sources of information	How we use “process” it	How we share it
Identifiers	N/A	N/A
Personal information Under California Civil Code section 1798.80	To enable use of our services and products, to communicate with you, to understand how our users interact with our site, and to improve our offerings	Sanne shares this data in line with previously agreed terms with you. However, we may further share your data if such action is legally required or if instructed by you.
Protected classifications	To understand how our users, interact with our site, and to conduct research business wide	We don't share it
Commercial information	To enable use of our services and products, to communicate with you, to understand how our users interact with our site, and to improve our offerings	Sanne shares this data in line with previously agreed terms with you. However, we may further share your data if such action is legally required or if instructed by you.
Biometric information	N/A	N/A
Electronic network activity information & Geolocation data	To enable use of our services and products, to communicate with you, to understand how our users interact with our site, and to improve our offerings	Sanne shares this data in line with previously agreed terms with you. However, we may further share your data if such action is legally required or if instructed by you.
Audio, electronic, visual, thermal, olfactory, or similar information	To identify you, to enable use of our site, services, and for safety purposes	Sanne shares this data in line with previously agreed terms with you. However, we may further share your data if such action is legally required or if instructed by you.
Professional / employment-related & Education information	For employment purposes only	Sanne shares this data in line with previously agreed terms with you. However, we may further share your data if such action is legally required or if instructed by you.
Inferences	N/A	N/A

11. Changes to this Privacy Statement

This Privacy Statement is dated 14 September 2020.

We reserve the right to amend this Privacy Statement at any time without notice, in which case the date of the Privacy Statement will be revised.

Information on Sanne and its regulators can be accessed via sannegroup.com

About Sanne

Sanne is a leading global provider of alternative asset and corporate services.

Established for over 30 years and listed as a FTSE 250 company on the Main Market of the London Stock Exchange, Sanne employs c1,800 professionals worldwide and administers structures and funds that have in excess of £250bn assets.

We deliver tailored fiduciary services to a highly valued international client base through a global network of offices located in 20 leading financial jurisdictions, which are spread across the Americas, Europe, Africa and Asia-Pacific.

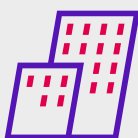
Clients are serviced through regional businesses which are led by global leaders with deep experience in alternative asset and corporate services. Each business contains multifunctional and skilled teams of professionally qualified people who are aligned to the specific requirements of each client, across one accredited platform.

Our specialist expertise is delivered across private debt, capital markets, real assets, private equity, hedge and corporate services. Our clients include leading fund managers, financial institutions and global corporates.

Sanne at a glance



More than 1,800 people worldwide



A FTSE 250 listed business



Over £250 billion assets under administration



Leaders in fund and administration services



Accredited business process



**20 jurisdictions
AMERICAS / EMEA / ASIA-PACIFIC**

Our promise

We believe that clients should expect more, so we stand for professionalism, innovation and quality. If you require a strategic relationship and a true business partnership with people who genuinely care about your growth. We are Sanne.

Let's talk...

For more information, please visit our website sannegroup.com