

# APPLEBY GLOBAL SERVICES BERMUDA PRIVACY NOTICE

Appleby Global Corporate Services (Bermuda) Ltd, Appleby Global Listing Services (Bermuda) Ltd, Appleby Global Representative Services (Bermuda) Ltd and Appleby Global Trust Services (Bermuda) Ltd (together **Appleby Global Services Bermuda**) use information about you, or that can identify you, and we are committed to using your personal information in a lawful and fair manner, and in compliance with the Bermuda Personal Information Protection Act 2016 (**PIPA**). This Privacy Notice is provided to you in compliance with our privacy notice requirements under PIPA.

## WHAT PERSONAL INFORMATION WE COLLECT FROM YOU

We collect, use and disclose personal information and sensitive personal information (as defined in PIPA) about you only for the following purposes for which it is collected. We do not sell or otherwise commercially exploit your personal information, nor do we use it for any third-party marketing purposes.

## THE TYPES OF INFORMATION, INCLUDING PERSONAL INFORMATION, THAT WE MAY COLLECT AND USE

First, we collect and may use whatever personal information that you provide to us in connection with the uses and purposes described herein. "Personal Information" that we may collect and use is comprised of information that can be used to identify you, or that may make you identifiable, and may include:

- Personal identification information, such as full name, date of birth, passport (and all related information therein), government issued identification, driving licence or other photographic identity details;
- IP address, information related to any potential politically exposed person status or other information about you that is in the public domain;
- Company or organization details, including business or personal contact information including residence, nationality, postal address, email address and any telephone number(s);
- Professional and employment information (which may include your level of education, professional qualifications, employer's name and details of directorships or other offices you may hold);
- Demographic information such as postcode, preferences and interests, association or professional affiliations or memberships;
- Financial information, including sources of wealth, existing or previous wills or estate information, your assets, existing banking details and credit history;

- Information pertinent to fulfilling our fiduciary services on an individual's or organisation's behalf, which may include criminal records, media reports, regulatory records about you from regulators either within or outside of Bermuda, police records or other security related information; and,
- Information we collect automatically through cookies and similar tracking technologies through our website, mobile applications or other online services (you may review our [online services privacy policy](#) for further details).

We may also collect, store and use the following "special categories" of more sensitive personal information including:

- Racial or ethnic origin;
- Political opinions, religious or philosophical beliefs;
- Trade union membership;
- Data concerning physical or mental health or disabilities;
- Genetic data or biometric data for the purpose of uniquely identifying a natural person;
- Data relating to any criminal allegations, criminal records, regulatory records, court cases and convictions;
- Marital or family status; or
- Data concerning a natural person's sex life or sexual orientation.

## HOW TO CONTACT US ABOUT OUR HANDLING OF PERSONAL INFORMATION

For any inquiries or concerns regarding our handling and use of your personal information, please contact our Privacy Officer:

**Privacy Officer, Bermuda:** Dr Carey Cooper

**Contact Information:** Tel: +44 (0)1624 647 612

**Email:** [dpo@applebyglobal.com](mailto:dpo@applebyglobal.com)

## THE PURPOSES FOR WHICH PERSONAL INFORMATION IS OR MIGHT BE USED

We may use the personal information that we collect for the following purposes:

- To respond to your enquiries;
- In connection with our provision of the fiduciary and other services that you have retained us to provide or have otherwise requested us to provide, including in relation to our conflict searches, client due diligence and KYC investigations, including where we are required by law to undertake such assessments;
- To send you e-alerts and other legal updates, marketing communications and other information or materials that may be of interest to you or which you have expressed an interest in receiving;
- To maintain our list of contacts;
- For Appleby Global Services Bermuda's business purposes, including operational and administrative matters, improving the provision of our fiduciary services; for data analysis, including client analytics; submitting invoices; detecting, preventing, and responding to actual or potential fraud, illegal activities, or intellectual property infringement;
- To assess the effectiveness of our events, promotional campaigns and publications;
- To evaluate and recruit personnel; and
- As we believe reasonably necessary or appropriate to: comply with our legal and/or regulatory obligations; to comply with our professional and ethical duties; respond to legal process or requests for information issued by courts, regulators, government authorities or other third parties; or, protect your, our, or others' rights, including legal rights.

## **THE IDENTITY AND TYPES OF INDIVIDUALS OR ORGANIZATIONS TO WHOM PERSONAL INFORMATION MIGHT BE DISCLOSED**

Appleby Global Services Bermuda will, or may, disclose your personal information to the following individuals and organizations. The below list is non-exhaustive and will be updated periodically as and when the purposes, use and individuals to whom personal information will be provided change:

- Appleby Global Services Bermuda, along with our group companies to offer cross jurisdictional services which may include (among others) the following:
  - Appleby Global Services (Cayman) Limited
  - Appleby Global Services (Hong Kong) Limited
  - Appleby Global Services (Jersey) Limited
  - Appleby Global Services (Mauritius) Ltd
  - Appleby Global Services (Seychelles) Limited
  - Appleby Global Services (Shanghai) Limited
  - Appleby (Bermuda) Limited
  - Appleby (BVI) Limited
  - Appleby (Cayman) Ltd.
  - Appleby (Guernsey) LLP
  - Appleby (Hong Kong)
  - Appleby (Isle of Man) LLC
  - Appleby (Jersey) LLP
  - Appleby (JV) Ltd & Cie (Shanghai Representative Office Trading as Appleby)
  - Appleby (JV) Ltd & Cie (Shenzhen Representative Office, Trading as Appleby)
  - Appleby (Mauritius) Ltd
  - Appleby International Services (Seychelles) Limited
- Bermuda Supreme Court
- Bermuda Magistrates Court
- Bermuda Health Council
- Bermuda Police Service
- Bermuda Bar Association
- Bermuda Monetary Authority
- DISCO EDiscovery, legal software and services solutions used for discovery
- Microsoft Sharepoint Document Management System
- FedEx
- Grant Thornton
- LexisNexis
- Office of the Tax Commissioner
- Opus 2, legal software and services solutions used for discovery
- ProServe Bermuda Limited, document courier service
- Registrar of Companies
- RelativityOne and its affiliated e-discovery service providers

*(For any individual who wants further information about the identity of those whom we may provide their personal information to please contact our Privacy Officer)*

The types of individuals or organizations that we may provide your personal information are as follows:

- Employees of Appleby Global Services Bermuda, but their use shall be limited to the performance of their duties and in line with the reason for processing. Our employees are required to keep that information confidential and are not permitted to use it for any purposes other than to provide legal services, to deal with requests which are submitted to us or for the purposes of facilitating our use of that information in accordance with this Privacy Notice.
- Third-party agents, service providers or contractors engaged by us to perform services on our behalf, such as web-hosting companies, information technology providers (including, document management/e-discovery providers and virtual/hybrid hearing hosting service providers), analytics providers, marketing and communications services and event hosting services, or our own advisors, auditors and accountants, professional indemnity insurers and financial institutions with whom we or you transact (including where the information is required as part of that third party's own processes to satisfy their legal or regulatory obligations, such as anti-money laundering checks).
- Law enforcement, courts or tribunals, other government authorities, [other lawyers and law firms], any third parties that are reasonably related to the mandate we have been retained or asked to assist you with, regulators or third parties (within or outside the jurisdiction in which you reside) as may be permitted or required by the laws of any jurisdiction that may apply to us and including for the purposes of complying with our legal or regulatory obligations.
- Third parties as provided for or required under contract, or as we deem otherwise reasonably necessary to provide our fiduciary services. This may include sharing information with some or all of the categories of third party listed above. We take reasonable efforts to notify you before we disclose information that may reasonably identify you or your organization, unless giving prior notice is prohibited by applicable law or is not possible or reasonable in the circumstances.
- Service providers (both commercial and affiliated with us), advisors, potential transactional partners, or other third parties in connection with the consideration, negotiation, or completion of a transaction in which we are acquired by or merged or amalgamated with another company or we sell, liquidate, or transfer all or a portion of our assets.

## **MEANS WE USE TO ALLOW YOU TO CONTROL OUR USE OF YOUR PERSONAL INFORMATION IN ACCORDANCE WITH PIPA**

To obtain access to, or make a request for a correction to, your personal information, or to exercise any other rights that you have under PIPA, please submit a written request to the Privacy Officer, which must include sufficient information to enable us, with reasonable effort, to identify the personal information that is relevant to your request. Your request must also include all necessary contact information for us to respond to your request.

You will be contacted by one of our privacy administrators promptly to confirm our receipt of your request, but no more than **two business days** after we have received your request.

Please note the following information associated with any request that we receive from you:

- We require your accurate and complete name and contact information.
- We will confirm receipt of your enquiry or instructions within 48 hours after we have received same.
- We will take a reasonable amount of time to process your enquiry or instructions and initially respond to your request, but usually no more than 45 days (depending upon the nature and complexity of your request).

Appleby Global Services Bermuda reserves all of its rights and protections afforded to it under PIPA. Appleby Global Services Bermuda reserves the right to update and revise this Privacy Notice at any time, as we may determine to be prudent or necessary to reflect changes in our privacy practices or legal requirements.

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