

This privacy notice sets out how SMP Group (hereinafter to be referred to as "SMP", "we", "us") uses and protects any information that you give SMP when you access or use our www.smppartners.com website ("Website").

SMP are committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this Website you can be assured that it will only be used in accordance with this privacy statement.

SMP may change this notice from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes. This notice is effective from 27th April 2018.

Definitions

SMP Group – any subsidiary of SMP Group Limited. Includes SMP Partners Limited, SMP Trustees Limited, SMP Fund Services Limited, SMP Accounting & Tax Limited, SMP Capital Markets Limited, SMP Yacht and Aircraft Limited, SMP eGaming Limited, SMP Partners Asia Limited, SMP Trustees (Hong Kong) Limited, SMP Partners SA, SMP Trustees SA, SMP Partners (Bahamas) Limited, SMP Partners (Jersey) Limited, SMP Partners (Cayman) Limited, SMP Partners (Caribbean) Corporation, Amber Business Limited, Kenforth Life Insurance Limited and SMP Partners (Malta) Limited.

Personal Data – any information that can identify, directly or indirectly, a living individual.

Controller – the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data. For the purpose of this notice, SMP Group Limited are the Controller.

Processing – means any operation or set of operations which is performed on Personal Data or on sets of Personal Data

What we collect

We may collect and process the following information:

- name and job title
- contact information including email address
- demographic information such as postcode
- preferences and interests
- other information relevant to customer surveys and/or offers
- information you provide when you use the Website
- client login credentials (username and password)

If you have provided us with the Personal Data of another person (including your employer), you warrant that they consent to the processing of their Personal Data and that you have informed them of our identity as a Controller and provided them with a copy of this notice.

What we do with the information we gather

We require this information to understand your needs and provide you with a better service and in particular for the following purposes:

- internal record keeping
- to improve our products and services
- periodically send promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided
- for market research purposes
- to customise the Website according to your interests
- to provide you with access to the online client portal

Under laws which are designed to protect your Personal Data, we need to have what is called a lawful basis or ground each time we use, share or otherwise process your Personal Data.

We may rely on one or more of the following lawful basis:

- our legitimate interest in the effective delivery of information and services to you
- if you have agreed (provided your consent) to us processing your Personal Data for the relevant purpose

Here is a list of all the ways that we may use your Personal Data, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your Personal Data for	Our reasons	Our legitimate interests
<ul style="list-style-type: none">- Internal record keeping- To improve our products and services- To customise the Website according to your interests- To provide client portal access (corporate and funds)	<ul style="list-style-type: none">- Our legitimate interests	<ul style="list-style-type: none">- Developing products and services and what we charge for them- To provide you with access to your funds and corporate portfolio information
<ul style="list-style-type: none">- Periodically send promotional emails about new products, special offers or other	<ul style="list-style-type: none">- Our legitimate interests	<ul style="list-style-type: none">- Working out which of our products and services may

<p>information which we think you may find interesting using the email address which you have provided</p> <ul style="list-style-type: none"> - From time to time we may contact you for market research purposes - For the use of Cookies on our Website – please see ‘How we use cookies’ 	<ul style="list-style-type: none"> - Your consent 	<p>interest you and telling you about them</p> <ul style="list-style-type: none"> - Defining types of customers for new products or services
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Security

We are committed to ensuring that your information is secure. We protect your information by:

- Offering you a secure transmission method to send us personal or company information; and
- Implementing suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online

You can protect your data by:

- Enabling security features on your browser
- Monitoring the URL of the site you are visiting (secure URLs begin with https:// rather than the normal http://) along with the security symbol of the site your browser (e.g. a broken or complete key in Internet Explorer) to help identify when you are communicating with a secure server.

How we use cookies

This Website creates a number of cookies, which are referred to as first party cookies as they are specific to the host site that created them. All the first-party cookies which are created do not store any personal or sensitive information, or anything that makes you personally identifiable to us. They are used for essential functionality such as security when processing form data or for analytics which helps us use anonymous visitor data to gain a better understanding of how people use our Website.

In addition to our first-party cookies, you may be served one or more third-party cookies during your visit to our Website. By using our Website we'll assume that you are happy to receive all cookies on our Website, but we have provided information on our dedicated [cookie policy page](#) on how you can set your browser to prevent cookies being created.

Third party cookies are cookies created by an external service when you use a page on our Website. These cookies are specific to the third-party's domain and accordingly the data held in them can be seen and managed by the third party and not by us. We control whether or not we use the third-party service with our Website, and how it is integrated and presented on our Website. We do not have

control over the cookies themselves. We carefully select third party services to use on our Website; ones that are not likely to abuse your privacy according to the terms of their privacy policies.

For further information, please see our dedicated [cookie policy page](#).

Governing Law & Jurisdiction

These terms of use are governed by and construed in accordance with Isle of Man law. By accessing and using the Website you agree that disputes arising in connection with this privacy notice shall be subject to the exclusive jurisdiction of the Isle of Man courts.

Your rights in relation to your Personal Data

You have certain rights in relation to your Personal Data. Pursuant to the applicable data protection laws, those rights will not necessarily apply in all cases or to all Personal Data which is processed by us. You have the right to request that we:

- provide you with a copy of any Personal Data which we hold about you (please refer to 'Request of Personal Information' below);
- update any of your Personal Data which is out of date or incorrect;
- delete any Personal Data which we hold about you, subject to regulatory compliance which
- requires certain information to be kept for a defined period of time;
- restrict the way that we process your Personal Data;
- consider any valid objections which you have to our use of your Personal Data; or
- provide your Personal Data to a third party provider of services (data portability).

You may choose to restrict the collection or use of your Personal Data in the following ways:

- whenever you are asked to fill in a form on the Website choose to call instead
- if you have previously agreed to us using your Personal Data for direct marketing purposes, you may change your mind at any time by writing to or emailing us at the below email address.

If you would like a copy of the information held on you please write to Data Protection Officer, SMP Group Limited, Clinch's House, Lord Street, Douglas, Isle of Man, IM99 1RZ.

Should you require an update or amendment to your Personal Data, please contact us by email using the details below and we shall endeavour to amend your records as soon as is practical and no later than 7 days of receipt of any update.

Request of Personal Information

You are entitled to access the information held about you. Your right to a copy of the Personal Data which we hold about you can be exercised in accordance with the Isle of Man General Data

Protection Regulation. In order to assist us in processing your request, please can you complete and submit the following [form](#) to dataprotection@smpppartners.com.

Sharing of Data

We may disclose your Personal Data to any member of our Group.

We may disclose your Personal Data to third parties:

- if we or substantially all of our assets are acquired by a third party, in which case Personal Data held about our customers will be one of the transferred assets; or
- if we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation; or
- in order to enforce or apply the terms of this notice or any other agreements; or
- to protect the rights, property or safety of us, our customers or others; or
- where we have received your permission for us to do so

We will not share your data with third parties for marketing purposes unless we have procured your express consent to do so.

Opting in and out of promotional communications

Upon agreeing to this privacy notice and opting in to our communications you agree for us to send you marketing and promotional material. This includes both online communications and other communications such as e-mail. If at any time you wish to opt-out you can do so by e-mailing the Data Protection Officer whose contact details are provided below. Opt-out can also be undertaken utilising the link provided on each promotional communication.

International transfers of Personal Data

When we transfer any part of your Personal Data outside the EEA or adequate jurisdictions we will take reasonable steps to ensure that it is treated as securely as it is within the EEA or adequate jurisdictions. These steps include but are not limited to the following:

- Binding corporate rules;
- Model contracts; or
- US/EU privacy shield

For the avoidance of doubt, SMP Group only transfers your Personal Data within its wider Group of companies who are subjected to the General Data Protection Regulation. Any further international transfers will be not be undertaken unless we have procured your express consent.

Links to other websites

Our Website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst

visiting such sites and such sites are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

Retention

We retain Personal Data for as long as we reasonably require it for legal or business purposes. In determining data retention periods, SMP takes into consideration local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need Personal Data, we securely delete or destroy it.

Contact us

If you have any questions, comments or requests regarding the protection of your Personal Data please contact the Data Protection Officer by email on dataprotection@smppartners.com

Complaint

If you are not satisfied with any complaints, disputes or information provided by SMP Group you have the right to make a complaint to the supervisory authority. The supervisory authority for SMP Group is the Isle of Man Information Commissioner's Officer who can be contacted via the following link: <https://www.inforights.im>. We would, however, appreciate the chance to deal with your concerns before you approach the IOM ICO so please contact us in the first instance.

Last updated: Monday 11th March 2019