

## Privacy Notice

### General

This Privacy Notice sets out how we obtain and use personal data about you before and after your relationship with us, in accordance with the Data Protection (Bailiwick of Guernsey) Law, 2017 (“the Guernsey DP Law”) and in accordance with the European Union General Data Protection Regulation (2016/679) (“GDPR”).

Peregrine is a “data controller”. This means that we are responsible for deciding how we hold and use your personal data. We are required under the data protection legislation detailed above to notify you of the information contained in this Privacy Notice.

This notice applies to clients, investors, shareholders, limited partners, beneficiaries and other trust or foundation parties, service providers, business referrers, intermediaries and other contacts of Peregrine (whether current, prospective, declined, exited or former) and users of Peregrine’s website [www.peregrine.gg](http://www.peregrine.gg). We may update this Notice at any time.

Any questions in relation to this Privacy Notice or requests in respect of personal data should be directed to [info@peregrine.gg](mailto:info@peregrine.gg) in the first instance.

### Who we are

Peregrine is a regulated investment services business. Peregrine, “our”, “us” and “we” for the purposes of this Privacy Notice includes Peregrine Guernsey Limited, Peregrine Wealth Limited and Peregrine Wealth Nominees Limited.

The relevant entity with the primary relationship with you will be confirmed in either an investment management agreement, the scheme particulars, other written agreement in respect of any client relationship or through a response to a ‘contact us’ query submitted via our website.

### The data we obtain and process – Investment Business Services

Peregrine processes data in order to provide investment business services including investment management services. The type of data we may collect and process includes:

- Contact details (including names, postal and email addresses, telephone numbers)
- Information required for Peregrine to meet legal and regulatory requirements in particular in respect of anti-money laundering legislation, including identification data (date and place of birth, nationality, identity number, copies of your passport or other identification document) and information regarding personal source of funds and source of wealth
- Information required for us to provide the services including financial information including bank account details to process payments and background information including employment history and income
- Information required by us to answer any queries you may have regarding our services or products including queries submitted via our website
- Any other information you may provide to us

We may also collect, store and use Special Category Data including:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Data relating to a person’s criminal record or alleged criminal activity

Special Category Data requires a higher level of protection and will only be processed where we have received explicit consent or the processing is necessary for compliance with a legal obligation.

**The data we obtain and process – Website**

- Contact us page

We collect and process your contact details (name, email address and telephone numbers) and information relating to your enquiry whenever you complete the fields within our contact us page.

- Analytics

We use third-party service providers, Google Analytics and Hotjar, to collect standard internet log information and details of visitor behaviour patterns. We do this to find out such things as the number of visitors to various parts of the site. This information is processed in a way that does not directly identify anyone. We do not make, and do not allow Google or Hotjar to make, any attempt to find out the identifies of those visiting our website.

- Cookies

Google Analytics and Hotjar use cookies to collect information on how visitors use our website. We use this information to compile reports and to help us improve our website. The cookies collect information in a way which does not directly identify anyone.

[Read Google's overview of privacy and safeguarding data.](#) To opt out of being tracked by Google Analytics across all websites, visit <https://tools.google.com/dlpage/gaoptout>

Read Hotjar’s Overview of [Data Safety, Privacy and Security](#) and [Cookie Information](#).

If we do collect personal data through our website, we will make it clear when we collect personal data and we’ll explain what we will do with it.

**Purposes of processing**

We use data, including personal data, for the following purposes, this table also confirms the lawful basis we are relying on in each case:

Purpose	Lawful Basis for Processing
To provide investment management and other investment services	<p>The legitimate interests of Peregrine as a provider of investment services.</p> <p>The legitimate interests of investors and investment business clients</p>

To administer any contract we have entered into with you or where a party related to an entity for which we are contracted to provide services	To fulfil the contract we have entered into.
Making arrangements for the termination of our business relationship	The legitimate interests of Peregrine to seek to ensure that business relationships are terminated efficiently and effectively
To manage our client, intermediary and other business relationships	The legitimate interests of Peregrine to seek to ensure that its business is conducted efficiently and with a view to enhancing business services
To obtain legal advice or representation	The legitimate interests of Peregrine and its clients to ensure that it is able to engage relevant legal advisers and/or representation
To ensure the security of Peregrine systems and staff and prevent fraud	The legitimate interest if Peregrine in protecting its systems and staff from being misused or the victim of criminal activity
To meet all legal and regulatory obligations applicable to Peregrine including in respect of managing conflicts of interest	<p>The legitimate interests of Peregrine as a financial services provider to process data to the extent necessary to meet all legal and regulatory obligations incumbent on it</p> <p>The processing is necessary for compliance with a legal obligation to which Peregrine is subject for example: relevant anti-money laundering and countering the financing of terrorism legislation</p>
To market our and our associates services to you.	Marketing is only undertaken with your explicit consent.
To maintain and monitor the performance of our website and to continue to look to improve the site and the services it offers to users	The legitimate interests of Peregrine to maintain the integrity of our website.
To answer any queries or comments you have on our products and services	<p>The legitimate interests of Peregrine as a provider of investment services.</p> <p>The legitimate interests of the individual to receive a response to their comments or queries</p>

The data sought will vary and the purposes for processing will overlap depending on the type of services provided.

### Change of purpose

We will only use your personal data 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 data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note: we may process your personal data without your knowledge or consent where this is required or permitted by law.

### **Failure to provide personal data**

If you fail to provide certain personal information and data when requested, we may not be able to fulfil the contract we have entered into for you, or on your behalf, or provide the services requested or we may be prevented from complying with our legal obligations.

### **Sources of personal data**

The sources of data may include clients, data subjects directly, introducers, intermediaries, advisers, third parties connected to the data subject (for example: another service provider who provides services to the data subject) or open-source material.

We collect personal data via the completion of forms provided to you and completed by you, from documents provided including due diligence documents, from correspondence including email, from meetings and telephone conversations.

We will collect personal data throughout the course of our business relationship or while we provide services to clients connected to you.

We collect personal data via our website through the use of Google Analytics and Hotjar and through the submission of forms.

### **Recipients of personal data**

We share information with third parties including third party service providers where required by law, where it is necessary to administer our business relationship, where it is necessary for us to provide the services to you or where we have another legitimate interest in doing so.

The following are potential recipients of personal data (in each case including respective employees, director and officers):

- Sub-contractors, agents, consultants or service providers such as insurance brokers, compliance, IT firms or other professional advisers of Peregrine or its clients and their clients and associated parties
- Bankers or other financial institution including investment brokers, custodians, managers or advisers
- Legal and other professional advisers
- Guernsey and overseas regulators, or other government or supervisory body and tax authorities when required by law
- Law enforcement agencies where considered necessary for Peregrine to fulfil legal obligations applicable to it

When Peregrine engages a third party to process your personal data, we will require them to process your personal data in accordance with our instructions and protect the data against unauthorised or accidental use, access, disclosure, loss or destruction. We do not allow them to use your personal data for their own purposes. They will only be permitted to process your personal data for a specified

purpose and in accordance with our instructions. Where they no longer need to your personal data to fulfil the contract, they will need to transfer the data back to us and/or destroy or delete any data held by them.

### **Transferring data outside of Guernsey and the EU**

In the event any of the third parties detailed above are outside of Guernsey and the EU and where we are transferring personal data which would be protected under the Guernsey DP Law or GDPR we will ensure that we meet the relevant requirements prior to carrying out such a transfer. This may include only transferring the data where we are satisfied that:

- The non-European Union country has Data Protection laws similar to the Laws in Guernsey and the European Union
- The recipient has agreed through contract to protect the information to the same Data Protection standards as Guernsey and the European Union
- We have obtained consent from the relevant data subjects to the transfer

Please note: Peregrine transfers and stores Personal Data on servers located in South Africa.

### **Data Security**

We have put in place appropriate security measure to prevent your personal data from being accidentally lost, altered, disclosed, used or accessed without authorisation. In addition, we restrict access to your personal data to those employees, agents, contractors, consultants and other third parties who have a business need to access the data. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

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 website nor do we accept, to the fullest extent permitted by law and liability for any errors in data transmission, machine, software or operating error or any other cause. We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator or a suspected breach where we are legally obliged to do so.

### **Data Retention**

Peregrine only keeps data for as long as is necessary to fulfil the purposes (as set out above) for which we collected it. Details of retention periods for different aspects of your personal data is available in our retention policy which is available on request from the Data Protection Representative. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential for harm from unauthorised use or disclosure of the data, the purposes for which we process the personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Once our business relationship ends, we will retain and securely destroy your personal data in accordance with our record retention and destruction policy, applicable legislation and/or regulatory requirements.

### **Data subject's rights**

As a data subject you have certain rights in respect of your personal data. You have the following rights:

- Right of access - you have the right to request a copy of the personal data that we hold about you and to check that we are lawfully processing that data.

- Right of rectification - you have the right to correct data that we hold about you which is inaccurate or incomplete. Please let us know if any of your personal data (including correspondence information) changes as soon as possible.
- Right of erasure - of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue to process it.
- Right to restrict processing - this enables you to ask us to suspend the processing of your personal data for example: if you want us to establish its accuracy or the reasons for processing it.
- Right of portability - you have the right to have the data we hold about you transferred to another organisation.
- Right to object - you have the right to object to certain types of processing including direct marketing. You also have the right to ask us to delete or remove personal data where you have exercised your right to object.
- Right to object to automated processing including profiling - you have the right not to be subject to decisions based on automated processing or profiling. Peregrine does not currently undertake any automated processing or profiling.

If you wish to exercise these rights you should send the request in the first instance to [info@peregrine.gg](mailto:info@peregrine.gg).

### **Status**

This Privacy Notice sets out our current policy as regards the maintenance and processing of personal data. It does not form, and should in no way be construed as, a contract and no contractual rights or causes of action shall arise in relation to or consequence of the content of this Notice.

### **Changes to this Privacy Notice**

We keep this Privacy Notice under review and any updates will appear on our website at [www.peregrine.co.za](http://www.peregrine.co.za). We last updated this Privacy Notice on 2 December 2020.

### **Contact details**

Peregrine has a Data Protection Representative and all enquiries in respect of this Privacy Notices, any complaints about the way in which your personal data is being processed, or any request to exercise any of the rights set out above should be directed to the Data Protection Representative via email at [info@peregrine.gg](mailto:info@peregrine.gg), telephone +44 (0)1481 758600 or by post at:

Peregrine  
Suite F1 Hirzel Court  
St Peter Port  
Guernsey  
GY1 2NN

### **Complaints**

In the event you wish to make a complaint about how your personal data is being processed or how your complaint has been handled you have the right to lodge a complaint directly with the Guernsey Data Protection Authority either via email [enquiries@odpa.gg](mailto:enquiries@odpa.gg) or by post at:

The Office of the Data Protection Authority, St Martin's House, Le Bordage, St Peter Port, Guernsey, GY1 1BR.

Alternatively, you may lodge a complaint with the Data Protection Supervisory Authority in the EU member state of your usual residence or place of work.

You may also appeal to certain courts against (i) any failure of the Guernsey Data Protection Authority to give written notice of whether the complaint is either being investigated or not being investigated and where applicable, the progress and the outcome of the investigation and (ii) a determination of the Guernsey Data Protection Authority not to investigate the complaint or a determination that a controller or processor has not breached or is not likely to breach an operative provision in connection with the complaint.

**How to contact us**

If you have any questions about this Privacy Notice or any data which we hold about you, please contact: [info@peregrine.gg](mailto:info@peregrine.gg).