

## PRIVACY NOTICE

### General

At Peregrine we are committed to safeguarding, as far as we can, the privacy of your personal information. This Privacy Notice sets out how we obtain and use personal data about you before and after your relationship with us.

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 including the Data Protection (Bailiwick of Guernsey) Law, 2017 (“the Guernsey DP Law”) and the European Union General Data Protection Regulation (2016/679) (“GDPR”) to notify you of the information contained in this Privacy Notice.

This Privacy 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).

We may update this Privacy Notice at any time.

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

### Who we are

Peregrine and “we” for the purposes of this Privacy Notice includes PW Trust Services Limited, PW Directors Limited, PW Nominees Limited and PW Secretaries Limited. These entities are all licensed by the Guernsey Financial Services Commission.

The relevant entity with the primary relationship with you will be confirmed in a written agreement with you.

### Data protection principles

To understand how and when we can use your personal data, it may be useful to understand the data protection principles. Peregrine must comply with these principles whenever we process your personal data.

Your personal data must be:

- Used in a lawful, fair and transparent manner;
- Collected for valid purposes that we have clearly explained to you, and we must not use it in any way incompatible with those purposes;
- Relevant to the purposes we have advised you of and limited to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

Not only must Peregrine comply with data protection legislation, but we must also be able to demonstrate that we do so. You can exercise your rights (as detailed below) to check that we are using your personal data appropriately.

### **The data we obtain and process**

Peregrine processes data in order to provide its services, including managed trust services, director services, nominee services and secretarial services.

The type of personal data or personal information we may collect and process includes:

- Contact details (including names, postal and email addresses, telephone numbers);
- Date of birth;
- Marital Status and dependents;
- 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, copies of utility bills and/or other proof of address/residence) and information regarding personal source of funds and source of wealth including value and how/where funds and wealth have been generated or obtained;
- Information required for us to provide the services, including financial information such as bank account details to process payments, and background information such as employment history and income;
- Any other information you may provide to us; and
- Background checks, including open-source data or specifically commissioned reports from reputable providers.

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

- Information about your health, including any medical condition, health and sickness records; and
- Data relating to criminal records 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 field within our contact us page.

#### **Analytics**

We use third-party service providers, Google Analytics and Hotjar, to collect standard internet information and details of visitor behaviour patterns. We do this to identify such things as the number of visitors to various parts of the site. This information is processed in a way that does not directly or indirectly identify anyone.

We do not make, and do not allow Google or Hotjar to make, any attempt to find out the identities 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 help us improve our website. The cookies collect information in a way which does not directly identify anyone.

For information on Google's Privacy Policies visit [Google Privacy Page](#). To opt out of being tracked by Google Analytics across all websites, visit Google opt-out tools.

For information on Hotjar's Privacy Notice visit, [www.hotjar.com/privacy](http://www.hotjar.com/privacy).

### Platform Services

We collect and process usernames and passwords for all persons registering to use our Platform Services. All passwords are stored in an encrypted hash format.

Peregrine uses necessary cookies to make our platform site work. These cookies belong to Peregrine's parent group. Necessary cookies enable core functionality such as security, network management and accessibility. You may disable these by changing your browser settings, but this may affect how the platform functions.

Most web browsers allow some control of most cookies through browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [allaboutcookies.org](http://allaboutcookies.org).

### 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
<p>To administer any contract we have entered into with you</p> <p>To administer any contract we have entered into with a third party and to which you have an interest</p>	<p>To fulfil the contract we have entered into</p>

Making arrangements for the termination of our business relationship	To fulfil the termination clauses of any contract or agreement we have entered into  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	To fulfil the contract we have entered into  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's 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	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  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
To market our and our associate's services to you.	Marketing is only undertaken with your explicit consent
To provided Digital Platform Services including reporting	To fulfil an agreement we have entered into

The data obtained and processed 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 purpose and that purpose 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 with 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, 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 and as part of the registration process for using our Digital Platform Services.

We will collect personal data prior to entering into a business relationship, throughout the course of our business relationship or while we provide services to clients or other persons connected to you.

### **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 institutions 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 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 process 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 European Union 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; or
- 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 and engages inter-group companies based in South Africa to provide administration and operational support which will include the processing of personal data. All South African transfers and processing are subject to relevant data protection clauses and all activities are carried out in accordance with our instructions and oversight.

### Data Security

We have put in place appropriate security measures 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 any 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** - you have the right 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** - you have the right 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@pwtrust.gg](mailto:info@pwtrust.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 Privacy Notice.

### Changes to this Privacy Notice

We keep this Privacy Notice under review and any updates will appear on our website at [www.pwtrust.gg](http://www.pwtrust.gg). We last updated this Privacy Notice on 10 July 2024.

### Contact details

Peregrine has a Data Protection Representative and all enquiries in respect of this Privacy Notice, 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@pwtrust.gg](mailto:info@pwtrust.gg), telephone +44 (0)1481 746989 or by post at:

PW Trust Services Limited  
Second Floor  
St Peter's House  
Le Bordage  
St Peter Port  
Guernsey  
GY1 1BR

## 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@pwtrust.gg](mailto:info@pwtrust.gg).