



## St Peters Trust Company Limited - Privacy Statement

### Introduction

St Peters Trust Company Limited and the companies owned by the same group (which in the rest of this statement we refer to collectively as “**St Peters**”) is committed to protecting your personal information. This Privacy Statement applies to our use of any personal information you provide to St Peters or that we collect about you, including through its website.

We must sometimes collect and use personal information about you:

- to obey the laws and regulations that apply to our business
- to provide you with the best experience before you become our client
- if you apply for our services, to take the steps needed for you to be accepted as our client
- if you become our client, to fulfill our contract with you or
- to protect our legitimate interests and yours.

We must use this information in line with all laws concerning the protection of personal information, including the Data Protection (Bailiwick of Guernsey) Law, 2017 (which in the rest of this Privacy Statement we refer to as the “**Data Protection Law**”).

### What information will St Peters collect about you?

If you contact us through our website, we will ask for your name, email address, mailing address and telephone number, so that we can respond to you.

If you apply to become a client of our fiduciary services, we will require you to give us extensive personal information, such as copies of your passport or identification documents, proof of address such as a utility bill or bank statement, and information about your financial activities and assets, your connections with financial crime or terrorism, your family, your political associations and yours and your family’s sources of wealth.

Even if you are not our client or applying to be our client, fiduciary laws and anti-crime laws may require us to collect extensive personal information about you if:

- you have a relationship with our client or prospective client or you are intended to benefit from our services
- you have an important role, interest or connection to one of the trusts, foundations, companies or other bodies that use our services.

If you have this type of connection to a client or prospective client and we cannot collect the required personal information directly from you, we may need to collect it from our client or prospective client.

Political opinions (which may be incidentally revealed by our questions about your political associations) and criminal data are called “special category data” under the Data Protection Law, which means that they have additional protection.

### How will St Peters use the information they collect about you?

St Peters uses your personal information in a number of ways, including the following:

- to contact you about communications that you have sent to us
- to personalise the way we present content to you
- to analyse and improve the services offered by St Peters
- to decide whether or not we can accept or keep you (or someone connected to you) as a client, as we are required by law to assess the risk that our clients or people connected to them may use our services for illegal purposes
- to carry out our contractual services and fulfill our duties under the laws and regulations that apply to those services. Some of our services require us to make decisions on your behalf or in your best interests, so we will use the information that you provide us to help determine how best to do this
- to make appropriate copies and backups to protect the integrity of our information systems
- to comply with the terms of our insurance policies
- to ensure, once our relationship ends, that your affairs with us are concluded in an orderly manner and that any unresolved issues or disputes may be addressed fairly and professionally
- if you are a job applicant, to evaluate and verify your suitability for a position
- if you are an employee or service provider, to:
  - fulfill our contract with you, such as ensuring that you receive pay and benefits that are due
  - ensure that you fulfill your contract with us, such as by supervising and evaluating your performance and ensuring that those needing your services can contact you

We do not use automated decision-making. If we intend to do so in the future, we will inform you before we start and explain why it is necessary and what rights you have to refuse, express your views, or appeal any automated decision.

### **What will St Peters contact you about?**

St Peters may contact you:

- about any service you have signed up for, or where you have asked for information
- to send you further correspondence, when you have opted to receive it
- about information or documents you have provided to St Peters
- if you are a client or person connected to our client, then as needed to carry out our services

### **Will St Peters share your personal information with anyone else?**

We will keep your information confidential except where disclosure is required or permitted by law (for example to government bodies and law enforcement agencies). St Peters does not transfer any personal data to commercial organisations unless we have your consent, we are legally required to do so, or it is necessary to provide our services to you.

We are required by law to verify the identity and activities of clients, potential clients and people connected to them, to reduce the risk of our services being used for illegal purposes. For this reason, we will use your personal information (in particular, your name, nationality, address and date of birth, and information on your close relations and business activities) to conduct background checks on you and your activities.

We will search publicly available information on internet search engines such as Google. We will also use subscription-based databases that keep records of people involved in illegal, improper or risky activities. This information, including information about any connection with financial crime or terrorism, will help us decide whether to do business with you or the client with which you are connected. We will repeat these searches periodically during our relationship with you. The information that we find will be kept in our files as long as required by law and by our regulator.

If you are a client of our fiduciary services, we may receive requests for your personal information from people or firms dealing with you or entities connected to you. For example, bankers, accountants, auditors, lawyers, fund administrators, financial advisors and other professionals may be required by law to have your personal information before providing their services. We may provide such information to them if we have been authorised by you, or as necessary as part of our fiduciary services and duties.

If you are a client, or a person connected to our client, who uses our assistance with interests or legal structures outside Guernsey, we may receive requests to send your personal information outside Guernsey. We will transfer your personal information outside the Bailiwick of Guernsey, the European Union or a country or territory with equivalent data protection laws only if there are adequate safeguards to your personal information or when you have given us your consent and it is necessary to perform the service that you have engaged us to do (unless the transfer is otherwise permitted or required by law). It is your right to have us inform you about whether the country or territory has equivalent data protection laws or other adequate safeguards and, if so, what those safeguards are.

If your personal information is transferred without adequate safeguards to a country or territory without equivalent data protection laws to Guernsey, you may not have the same rights there to keep your personal information secure and safe from abuse, nor the same ability to enforce those rights. You should keep this in mind when we ask for your consent to transfer your personal information to another country or territory.

Fiduciary laws require us to keep your personal information confidential. However, laws to deter financial crime create exceptions to this confidentiality, where we must report certain personal information about our clients and people connected to them to governmental authorities. We are also required by law to publish details about companies, foundations and other bodies that we administer into public registers, which may include your personal information if you perform certain roles on those bodies – if you are concerned about this, please ask us about it.

### **How long will St Peters keep your personal information?**

To fulfill our fiduciary duties, to conclude relationships in an orderly manner and to ensure that any disputes or unresolved issues may be addressed fairly and professionally, we have a policy of keeping copies of files for up to six years after our services end, before destroying them. If information in a file is part of a dispute or investigation after our services end, we may keep the information until the end of the dispute or investigation. If you would like details of our document retention policy or do not wish it to apply to your files, please contact us at the address at the end of this Privacy Statement.

As our business is supervised by a regulator, we are required from time to time to keep certain records to show our regulator that we are conducting our business properly and keeping client records accurate and up to date. This means that we may be required to keep your personal information in our files until the regulator no longer requires us to do so.

### **Can you find out what personal information St Peters holds about you?**

Under the Data Protection Law you have the right to confirm that we hold personal information about you and request copies of that information. Normally this information will be provided free of charge but we reserve the right to charge you a reasonable fee if you request multiple copies. If you make a request, we may require you to prove your identity with 2 pieces of government-issued photo identity documents. Guernsey fiduciary law protects the confidentiality of some trust information, which may limit your right of access under the Data Protection Law.

## **What other rights do you have about your information?**

You have the right to request us to correct any incomplete or inaccurate information that we have about you. If you wish to do this, you should send us a written request explaining what information you want completed or corrected, and what is incorrect or why it is incomplete. You have the right to ask us not to use the information until we have verified its accuracy and completeness. We will tell you if we have provided anyone else with information which has turned out to be incorrect or incomplete, and we will have that other person erase, correct, complete or not use that information if it is practicable to do so and not disproportionate to the effort needed.

You may also ask us to erase incorrect or incomplete information if we no longer need it or if we do not have the right to hold it under the Data Protection Law.

If we need your consent to use your personal information, you may withdraw that consent at any time after you have given it by contacting us, either by using the contact details below or by emailing any St Peters staff member.

To the extent that we process your data automatically, you may ask us to provide you with your personal information in a commonly-used, machine-readable format. This will not apply to information we have in our files about you that we must keep by law, such as our background searches.

If you believe that we have not complied with the Data Protection Law in a way that affects your personal information or your rights, please contact us via the details below. If you are not satisfied with the outcome you may make a complaint to Guernsey's Data Protection Authority at +44 (0) 1481 742074 or enquiries@odpa.ggcontact or via its website at www.odpa.gg. Data Protection Authority decisions may be appealed in Guernsey court. If you wish to appeal a Data Protection Authority decision, you should do so quickly or you may lose your appeal right.

## **Changes to the St Peters Privacy Policy**

This Privacy Statement may be updated from time to time. We will post notices of updates on our website. If you use our website in the future, please check for updates.

## **Contacting St Peters Trust Company**

You can contact us at:

St Peters Trust Company  
PO Box 132  
Quay House  
South Esplanade  
St Peter Port  
Guernsey GY1 4EJ

Phone: +44 (0) 1481 723674

If we have appointed a Data Protection Officer, he or she may be contacted at the above address.