

Privacy Notice

It is important to ensure the privacy of your data and this privacy notice describes how Affinity Private Wealth ('we', 'us') collect and process personal information about you; how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to all personal information we collect about you. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

1. Information we collect

We may collect your personal information from a variety of sources, including information we collect from you directly (e.g. when you contact us in relation to the provision of services), and information we collect about you from other sources, including commercially available information, such as public databases (where permitted by law).

Certain personal information is required as a consequence of any contractual relationship we have with you, to enable us to carry out our contractual obligations. Failure to provide this information may prevent or delay the fulfilment of these obligations.

1.1. Information we collect directly from you

The categories of information that we may collect directly from you include the following:

- (a) personal details (e.g. name, age, place and date of birth);
- (b) contact details (e.g. phone number, email address, postal address or mobile number);
- (c) occupation details (e.g. role; employer or business name);
- (d) due diligence, such as nationality, gender, marital status, copies of identity documents, source of wealth and tax status/residency.

1.2. Information we collect from other sources

The following are examples of the categories of information we may collect from other sources (such as business partners, intermediaries, internet, KYC6 or commercial registers):

- (e) personal details (e.g. name, age, date of birth);
- (f) contact details (e.g. phone number, email address, postal address or mobile number);
- (g) occupation details (e.g. role, employer or business name)
- (h) business connections (e.g. directorships)

2. How we use your personal information and the basis on which we use it

We use your personal information to:

- (a) carry out background checks prior to accepting you as a client;
- (b) contact you with questions and other information regarding the services we are providing to you;
- (c) ensure that our records are kept accurate and up to date;
- (d) ensure we issue accurate invoices for our services;

- (e) send you information about products and services which we think will be of interest to you;
- (f) comply with legal or regulatory obligations to which we are subject

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (g) to fulfil our contractual obligations to you through the provision of services;
- (h) to comply with our legal obligations to you or to a third party
- (i) to meet our legitimate interests so that: we are able to provide the services you request; our services function correctly in relation to your needs; any complaints or concerns can be promptly relayed to you; we can respond to any questions or concerns you might have; we may carry out research and analysis to ensure products and services we offer are relevant to you, and; our records are kept up to date and accurate; and
- (j) to send you direct electronic marketing messages to the extent you have consented to receiving such messages in accordance with applicable law.

3. Your rights over your personal information

Please let us know if any of the personal information that we hold about you changes so that we can correct and update the information on our systems.

You can view, delete, correct or update the personal information you provide to us by contacting us using the details set out below.

In certain circumstances you may object to specific processing activities, require us to restrict how we process your personal information and ask us to share your personal information in a usable format with another company. Where you have given your consent to a particular type of processing, you may withdraw that consent at any time.

To exercise any of the above rights, please contact us using the details set out below.

4. Information Sharing

In general, we do not share your personal information with third parties (other than service providers acting on our behalf) unless we have a lawful basis for doing so.

We may disclose or transfer personal data collected by us to our group companies insofar as reasonably necessary for the purposes of our service offering or for bona fide compliance purposes as well as on the legal basis set out in this Privacy Notice.

We rely on third-party service providers to perform a variety of services on our behalf, such as website hosting, electronic message delivery, payment processing, data analytics and research. This may mean that we have to share your personal information with these third parties. When we share your personal information in this way, we put in place appropriate measures to make sure that our service providers keep your personal information secure.

Other situations in which we may disclose your personal information to a third party, are:

- (k) to perform other services we request from service providers;
- (l) where permitted by law, to protect and defend our rights and property; and

(m) when required by law, and/or public authorities;

We may also share aggregated information that cannot identify you for general business analysis, e.g. we may disclose the number of visitors to websites or services.

5. Information Security

We have implemented generally accepted standards of technology and operational security to protect personal information from loss, misuse, alteration or destruction. We require all employees and principals to keep personal information confidential and only authorised personnel have access to this information.

We will retain your personal information in accordance with our data retention policy, which sets out data retention periods required or permitted by applicable law.

6. Information Transfer

Your personal information may be transferred to, stored, and processed in a country other than the one in which it was provided. When we do so, we transfer the information in compliance with applicable data protection laws.

7. Website and Cookies

Cookies

We gather information from users of this web site automatically and when you decide to provide us with information, for example, when you complete a form on www.affinitypw.com. This information is treated with confidence, and is only used by Affinity Private Wealth as per the terms of the Privacy Statement/Policy.

We may use "cookies" to keep, and sometimes track, information about you.

About cookies

Cookies are small text files which are downloaded to your computer or mobile device when you visit a web site or application. Your web browser (such as Internet Explorer, Mozilla Firefox or Google Chrome) then sends these cookies back to the web site or application on each subsequent visit so that they can recognize you and remember things like personalised details or user preferences. Cookies do not damage your system. You can reset your browser so as to refuse any cookie or to alert you to when a cookie is being sent.

To improve your experience and to make our service to you better we use cookies for the purposes of system administration and analytics of our web site. This gives us information about the number of visitors to different parts of our web site.

We do not share this data with third parties. Our cookies do not store sensitive information such as your name or address, they simply enable us to see behaviour on the web site to help us improve your experience. However, if you'd prefer to restrict, block or delete cookies from www.affinitypw.com, or any other web site, you can use your browser to do this. Each browser is different, so check the 'Help' menu of your particular browser (or your mobile phone's handset manual) to learn how to change your cookie preferences.

How to control my cookies

There are various ways that you can control and manage cookies which are discussed in more detail below. Please remember that any settings you change will not just affect www.affinitypw.com cookies. These changes will apply to all web sites that you visit (unless you choose to block cookies from particular web sites).

Managing cookies in my browser

Most modern browsers will allow you to:

- See what cookies you've got and delete them on an individual basis
- Block third party cookies
- Block cookies from particular web sites
- Block all cookies from being set
- Delete all cookies when you close your browser

You should be aware that any preferences will be lost if you delete cookies. This includes where you have opted out from cookies, as this requires an opt-out cookie to be set. Also, if you block cookies completely many web sites will not work properly and some functionality on these web sites will not work at all.

Managing analytics cookies

It is possible to opt out of having your anonymised browsing activity within web sites recorded by analytics cookies. www.affinitypw.com uses Google Analytics and you can opt out of their cookies by visiting the Google Analytics opt-out page. Please note that this will take you to Google Analytics web site and generate a 'no thanks' cookie, which will stop any further cookies being set by those third parties.

Further information about cookies and how to manage them

If you'd like to learn more about cookies in general and how to manage them, visit aboutcookies.org*

*Please note that we can't be responsible for the content of external web sites.

8. Contact Us

If you have questions or concerns regarding the way in which your personal information has been used, please contact us by email at connect@affinitypw.com. Alternatively you can write to us at Affinity Private Wealth, 24 Seale Street, St Helier, Jersey JE2 3QG.

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the Jersey data protection authority which may be contacted as follows:

Address:
Office of the Information Commissioner
Brunel House
Old Street
St Helier
Jersey
JE2 3RG

Telephone: +44 (0)1534 716530

Email: enquiries@dataci.org

Website: www.oicjersey.org

9. Changes to the Privacy Notice

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time and changes and additions to this privacy notice are effective from the date on which they are posted. Please



review this privacy notice from time to time to check whether we have made any changes to the way in which we use your personal information.