

## Ipes Group Data Protection Privacy Policy

### 1. This Policy

This Policy is issued by the Ipes Group and is addressed to all persons outside of Ipes with whom we interact, including visitors to our website, customers, individuals, Personnel of corporate structures and vendors, and other recipients of our services (together “you”). Defined terms used in this Policy are explained in Section 13 below.

This Policy may be amended or updated from time to time to reflect changes in our practices. We encourage you to read this Policy carefully, and to regularly check this page to review any changes we might make in accordance with the terms of this Policy. This privacy statement only covers our website, <http://www.ipes.com> but does not cover any sites that you can link to from our website. You should always be aware when you are moving to another site and read the privacy statement on that site.

### 2. Processing of Personal Data

#### Collection of Personal Data

Ipes collects Personal Data about you from a variety of sources:

- We obtain your Personal Data when it is provided to us either by you, your representatives or a third party.
- We collect your Personal Data in the ordinary course of our relationship with you.
- We obtain your Personal Data that has been made public, including via the internet and subscription databases.

#### Creation of Personal Data

We create Personal Data about you, such as records of your interactions with us, details of your accounts, etc subject to applicable law.

#### Relevant Personal and Sensitive Personal Data

The categories of Personal Data about you that we process include:

- Personal Details: name(s); gender; date of birth; passport number(s); other government issued number(s); nationality; images of passports; driving license numbers); signatures.
- Contact Details: address; telephone number; email address.
- Financial Details: billing address; bank account numbers; instruction records; transaction details, and counterparty details.

Ipes does not routinely seek to collect or otherwise process your Sensitive Personal Data. Should we need to do so:

- The Processing is necessary for compliance with a legal obligation;
- The Processing is necessary for the detection or prevention of crime;
- You have made those Sensitive Personal data public; or
- We have obtained your consent prior to Processing your Sensitive Personal data.

#### Purposes for which we may Process your Personal Data

The purposes for Processing your Personal Data and legal basis for doing so are:

Processing purpose	Legal basis for Processing
<p>AML/KYC: <i>fulfilling our and our clients' regulatory compliance obligations, including 'Know Your Customer' checks, confirming and verifying identity, screening against subscription databased (e.g. for sanctions, adverse media and PEP lists) and using <a href="http://www.theidregister.com">www.theidregister.com</a> to achieve these purposes.</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the prevention of money laundering, sanctions violations and protection against fraud; or</li> <li>• We have obtained your prior consent.</li> </ul>
<p>Client onboarding: <i>onboarding of new clients/entities, and compliance with our internal control framework</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the onboarding of new clients/entities/investors; or</li> <li>• We have obtained your prior consent.</li> </ul>
<p>Provision of products and services to you: <i>administering relationships and related services, performance of tasks necessary for the provision of the requested services; communicating with you in relation to these services</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of providing products and services to you; or</li> <li>• We have obtained your prior consent.</li> </ul>
<p>Operation of our websites: <i>operation and management of our websites; providing content to you; displaying advertising and other information to you; and communicating and interacting with you via our websites.</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of operating our websites; or</li> <li>• We have obtained your prior consent.</li> </ul>
<p>IT operations: <i>management of our communication systems; operation of IT security; IT security audits</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of managing and operating our IT systems and ensuring the security of those systems.</li> </ul>
<p>Security: <i>including physical access to our premises and electronic security where you access our electronic systems</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of ensuring the physical and electronic security of our business, premises and assets.</li> </ul>

<p>Investigations: <i>detecting, investigating and preventing breach of policy and criminal offences</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of detecting, and protecting against, breaches of our policies and applicable laws;</li> </ul>
<p>Legal compliance: <i>compliance with our and your legal and regulatory obligations under applicable laws</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation.</li> </ul>
<p>Legal proceedings: <i>establishing, exercising and defending legal rights</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purposes of establish, exercising and defending legal rights;</li> </ul>
<p>Marketing: <i>communication with you via any means subject to ensuring that such communications with you are in accordance with applicable law; and maintaining and updating your contact information where appropriate</i></p>	<ul style="list-style-type: none"> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of conducting marketing and communicating with you about Ipes or our products and services; or</li> <li>• We have obtained your prior consent.</li> </ul>
<p>Research: <i>conducting market or customer satisfaction research; and engaging with you for the purposes of obtaining your views on our products and services</i></p>	<ul style="list-style-type: none"> <li>• We have a legitimate interest in carrying out the Processing for the purpose of conducting research and producing analysis based on your views; or</li> <li>• We have obtained your prior consent.</li> </ul>
<p>Improving our products and services: <i>planning improvements to existing products and services; creating new products and services</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of improving our products and services;</li> <li>• We have obtained your prior consent.</li> </ul>
<p>Risk Management: <i>audit, compliance, controls and other risk management</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of managing risks to which our business is exposed;</li> </ul>
<p>Fraud prevention: <i>Detecting, preventing and investigating fraud</i></p>	<ul style="list-style-type: none"> <li>• The Processing is necessary for compliance with a legal obligation; or</li> <li>• The Processing is necessary in connection with any contract that you have entered into with Ipes or a Serviced Entity; or</li> <li>• We have a legitimate interest in carrying out the Processing activities for the purpose of detecting, preventing and investigating fraud; or</li> <li>• We have obtained your prior consent.</li> </ul>

### 3. Disclosure of Personal Data within the Ipes Group and to third parties

We may disclose your Personal Data to other entities within the Ipes Group, for legitimate business purposes, in accordance with applicable law. In addition, we may disclose your Personal Data to:

- clients and their professional advisors;
- third parties (e.g. banking institutions) who provide services or are associated with the activities of Ipes clients;
- to comply with legal or regulatory requirements; and/or
- service providers to Ipes (e.g. Auditors, Lawyers, IT providers etc);
- Governmental, legal, regulatory, or similar authorities, upon request and or where required, including for purposes of reporting any actual or suspected breach of applicable law or regulation;
- Any relevant party, claimant, complainant, enquirer, law enforcement agency or court, to the extent necessary for the establishment, exercise or defense of legal rights in accordance with applicable law; and/or
- Any relevant party for the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties.

Where we transfer your Personal Data to across the Ipes Group, we do so on the basis of:

- Adequacy decisions;
- Binding Corporate Rules;
- Suitable Standard Contractual Clauses; or
- Other valid transfer mechanisms.

### 4. Data Security

We have implemented appropriate technical and organisational security measures designed to protect your Personal Data.

You are responsible for ensuring that any Personal data that you send to use are sent securely.

### 5. Data Accuracy

We take reasonable steps designed to ensure your Personal data is up to date. From time to time we may ask you to confirm the accuracy of your Personal Data to ensure we can continue to correctly process your Personal Data, in accordance with applicable law. You are obliged to inform us of any changes to your Personal Data, and to provide a timely response to our requests for information.

### 6. Data Minimisation

We take reasonable steps to ensure that the Personal Data we ask from you in limited to the Personal Data we reasonable require in connection with the purposes set out in this Policy.

### 7. Data Retention

We take reasonable steps to ensure that your Personal Data is retained for the period necessary for the purposes set out in this Policy. The criteria used to determine the duration for which we retain data include:

- retaining hard and/or electronic copies of your Personal Data for as long as:
  - we maintain an ongoing relationship with you; or
  - your Personal Data are necessary in connection with the lawful purposes set out in this Policy, for which we have a valid legal basis (e.g. where we have a legal obligation to retain your data),

and

- the duration of any applicable period under applicable law (e.g. any period for which your Personal Data may be relevant).

Once the retention periods have concluded, we will either:

- permanently delete or destroy the relevant Personal Data;
- archive your Personal Data so that it is beyond use; or
- anonymise the relevant Personal Data.

## 8. Your legal rights

You have the right to access, and obtain copies of, information held about you. Your right of access can be exercised and any access request may be subject to a reasonable fee to meet our costs in providing you with details of the information we hold about you. You acknowledge and agree that we may discharge our obligation without providing copies of all or any personal data.

You have the right to get any inaccurate information we hold about you corrected. You also have the right to request erasure of information we hold on you. Please be aware that we may not be able to achieve erasure where your request is inconsistent with the legal and regulatory obligations placed on Ipes and its clients.

You also have the right to request Ipes or its clients to restrict the processing of your data. Whilst Ipes will seek to meet your request, Ipes may be unable to meet your request where this would disrupt the normal course of business of Ipes or its clients.

You have the right to object to the processing of your data. Whilst Ipes will seek to meet your request, Ipes may be unable to meet your request where there are compelling legitimate or public interests in continuing to process your data that outweigh your interests, rights and freedoms; or where processing is necessary for the establishment, exercise or defence of legal claims.

You also have the right to lodge complaints with a Data Protection Authority regarding our Processing of your Personal Data.

## 9. Monitoring telephone calls and emails to Ipes Group

Telephone calls using the telephone numbers provided on this web site and all Ipes Group extensions and e-mail correspondence with the Ipes Group via generic or individual employees e-mail addresses may be recorded or monitored. By using such communication methods you are consenting to the recording or monitoring of the same.

## 10. Contact Details

For the purposes of this Policy, the Ipes data controllers and processors are:

- Ipes (Guernsey) Limited

- Ipes (Jersey) Limited
- Ipes (UK) Limited
- Ipes Depository (UK) Limited
- Ipes (Luxembourg) S.A.
- Ipes Investor Services (Ireland) Limited

If you have any comments, questions or concerns about any of the information in this Policy, or any other issues relating to the Processing of Personal Data by the Ipes Group, please contact your regular Ipes contact or by using the contact details for each entity which are on the Ipes contact page of [www.ipes.com](http://www.ipes.com), or the Ipes Group Data Protection Office on [dpo@ipes.com](mailto:dpo@ipes.com).

## 11. Defined Terms

Controller	The entity that provides instructions to the Processor on how data should be processed
Personal Data	Information about an individual, from which an individual is identifiable
Process or Processed or Processing	Anything that is done with Personal Data, such as collection, recording, structuring, storage, disclosure etc.
Personnel	Any current, former or prospective directors, officers, controllers, consultants, employees, etc
Processor	Any person or entity that Processes Personal Data as instructed by the Controller.
Sensitive Personal Data	Data about race, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health, sexual life, or any other information that may be deemed to be sensitive.