



I-CAP GROUP

PRIVACY NOTICE





1. KEY DEFINITIONS USED IN THIS PRIVACY NOTICE

- 1.1 “**Consent**” means permission which is explicitly given or stated, and which can be withdrawn at any time.
- 1.2 “**Controller**” means the person who determines the purposes and means of processing Personal# Data.
- 1.3 “**Data Subject**” means a natural person whose Personal Data are processed in accordance with this Privacy Notice.
- 1.4 “**Data Subject Access Request**” means a request made by a Data Subject to a Controller to access Personal Data related to that Data Subject which are held by a Controller or by a Processor in order to establish the lawful basis upon which such Personal Data are held and how they are processed.
- 1.5 “**Entity**” means a company, trust, foundation, partnership or similar form of legal arrangement.
- 1.6 “**Identifier**” means a piece of information that can be used to establish the identity of a Data Subject.
- 1.7 “**Personal Data**” means information that can be used directly or indirectly to identify a natural person by reference to an Identifier.
- 1.8 “**Processor**” means the person responsible for processing Personal Data on behalf of a Controller.
- 1.9 “**Special Category Data**” means those special categories of Personal Data that are sensitive and include information about minors, health, religion, genetic data and biometric data where processed to uniquely identify a natural person.
- 1.10 “**Technical Data**” means internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access **our** website or hosted services.
- 1.11 “**Usage Data**” means information about how you use our website, servers, network and services.



I-CAP GROUP

2. WHO WE ARE AND HOW TO CONTACT US

- 2.1 Integrated-Capabilities Ltd (which is licensed by the Isle of Man Financial Services Authority to provide Corporate and Trust Services) and has its registered office at Bridge Chambers, West Quay, Ramsey, Isle of Man, IM8 1DL) and Integrated-Capabilities (Malta) Ltd (which is licensed by the Malta Financial Services Authority to act as a Trustee, to provide Fiduciary Services, to act as an Administrator of Private Foundations and to act as a Retirement Scheme Administrator) and has its registered office at 45/13 Strait Street, Valletta, VLT 1434, Malta are members of I-Cap Group Ltd, an Isle of Man private limited company. I-Cap Group Ltd does not itself provide services to the clients of its members. References in this privacy notice to “***I-Cap Group***” are to the members of I-Cap Group Ltd and their respective affiliates both individually or collectively as the context requires.
- 2.2 I-Cap Group acts both as a Controller and a Processor of Personal Data. Personal Data are held and processed in accordance with this privacy notice and in compliance with applicable data protection regulation and laws. This privacy notice explains what Personal Data we collect and hold and when and how they are processed. It also informs you of your rights and our obligations concerning your Personal Data.
- 2.3 We have a group Privacy Officer who is responsible for overseeing the protection of Personal Data and approach to privacy. If you have any questions about this privacy notice, including any request as to how to exercise your rights as a Data Subject please contact the Privacy Officer using the details below:

3. PERSONAL DATA THAT WE COLLECT

3.1 Personal Data that we may collect from you includes one or more of the following Identifiers:

3.1.1 Name

3.1.2 Date and Place of Birth

3.1.3 Gender

3.1.4 Marital Status

3.1.5 Nationality

3.1.6 Home Address

3.1.7 Personal Email

3.1.8 Business Email

3.1.9 Home Telephone Number

3.1.10 Mobile Telephone Number

3.1.11 National Insurance Number

3.1.12 Tax Identification Number

3.1.13 Passport Details

3.1.14 Driver's Licence Details

3.1.15 Identity Card Details

3.1.16 Occupation and Income Details

3.1.17 Source of Wealth and/or Source of Funds

3.1.18 Personal Bank Account Details

3.1.19 Special Category Data

3.1.20 Technical Data

3.1.21 Usage Data

4. WHY AND HOW WE USE YOUR PERSONAL DATA

4.1 Our lawful bases for processing Personal Data and the purposes for which it is processed are as follows:

4.1.1 Lawful basis: **Contract**

Purpose: To fulfil the terms of a contract entered into between us or with an Entity owned or controlled by you and to correspond with you and to address you correctly in communications in respect of such contract.

4.1.2 Lawful basis: **Legal obligation**

Purpose: To enable us to meet our professional and compliance obligations under applicable legislation including but not limited to detecting and preventing bribery, money laundering, tax evasion and the financing of terrorism.

4.1.3 Lawful basis: **Legitimate interests**

Purpose: To operate and manage our everyday business needs including but not limited to accounting, internal reporting needs, market research, statistical information and/or market research, to progress or respond to professional queries, to ensure appropriate IT security and to prevent fraud. When we process Personal Data under this basis we ensure that there is a fair balance between our legitimate interests and your fundamental rights and freedoms.

Purpose: To send you or to present you with marketing information and to update you on relevant topics which we have assessed would be beneficial for you to receive whether as a client or as an owner or Controller of an Entity to which we supply our services. Such information would be restricted to informing you about our services we offer or about changes in legislation or regulations.

Purpose: To establish, exercise or defend legal claims and to protect our legitimate interests or to protect the legitimate interests of another Data Subject or to an Entity owned or controlled by a Data Subject or whenever courts are acting in their judicial capacity.



I-CAP GROUP

Purpose: To manage a potential or actual conflict of interest in respect of the services that we provide to a Data Subject or to an Entity owned or controlled by a Data Subject.

4.1.4 Lawful basis: **Consent**

Purpose: To process your Personal Data, including Special Category Data for a specific purpose. The specific purpose for which your Personal Data or Special Category Data will be processed will be disclosed to you when your Consent to process your Personal Data or Special Category Data is being sought by us.

4.2 Where we process Special Category Data our legal basis and the conditions for doing so are as follows:

4.2.1 Lawful basis: **Contract**

Condition: To carry out our obligations and exercising specific rights as a Controller or a Data Subject in the field of employment and social security and social protection law.

4.2.2 Lawful basis: **Legitimate interests**

Condition: To assess the working capacity, medical diagnosis, health care and treatment of a Data Subject who is employed by us or who is a member of a pension scheme administered by us.

Condition: To establish, exercise or defend legal claims or whenever courts are acting in their judicial capacity.

4.2.3 Lawful basis: **Vital interests**

Condition: To protect the vital interests of a Data Subject or of another natural person where the Data Subject is physically or legally incapable of giving Consent.

5. YOUR RIGHTS

5.1 You have the right to request access to your Personal Data and to receive information about:

5.1.1 what Personal Data we hold about you;

5.1.2 the lawful bases for processing your Personal Data and the purpose(s) for which it is processed;

5.1.3 the categories of Personal Data concerned;



I-CAP GROUP

- 5.1.4 the category of recipients to whom your Personal Data has or will be disclosed;
 - 5.1.5 how long we intend to retain your Personal Data; and
 - 5.1.6 if we did not collect your Personal Data directly from you, information about how we acquired it.
- 5.2 If you believe that we hold any incomplete or inaccurate Personal Data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible unless there is a valid reason for not doing so, at which point you will be notified.
- 5.3 You also have the right to request erasure of your Personal Data or to restrict processing (*where applicable*) in accordance with applicable data protection laws. In addition, you may object to any direct marketing from us. Where applicable, you also have the right to portability of your Personal Data and the right to be informed about any automated decision-making we may use.
- 5.4 If we receive a Data Subject Access Request from you to exercise any of the above rights, we may ask you to verify your identity before acting on such request; this is to ensure that your Personal Data is protected and kept secure.

6. SHARING AND DISCLOSING YOUR PERSONAL DATA

- 6.1 As a Controller or Processor we may share or disclose your Personal Data to/with:
- 6.1.1 counterparties with whom we engage in the provision of our services;
 - 6.1.2 third-parties such as administrators, liquidators and receivers, administration service providers, accountants, advisors, agents, attorneys-in-fact, asset managers, auditors, brokers, credit scoring agencies, custodians, debt collection agents, employment, manning and recruitment agencies, factors, financial institutions, independent financial advisors, insurers, IT service providers, payroll service providers, security service providers, pension trustees, professional service providers, retirement scheme administrators, stockbrokers, etc. that undertake services for us or for an Entity that we manage or administer on your behalf and to the extent that they require



I-CAP GROUP

access to such Personal Data to perform their services to us or to an Entity that we manage or administer on your behalf. All Processors acting on our behalf do so at our direction and only process your Personal Data in accordance with instructions from us given in compliance with this privacy notice, the data protection laws and any other appropriate confidentiality and security measures;

- 6.1.3 third-parties with whom you instruct us to communicate on your behalf or on behalf of an Entity that we manage or administer on your behalf;
- 6.1.4 government bodies or other government officials where we are required to do so by law;
- 6.1.5 regulatory authorities where we are required to do so by law;
- 6.1.6 I-Cap Group members in the performance or delivery of our professional services to you or to an Entity owned or controlled by you; or
- 6.1.7 our advisors, business partners, affiliates, independent contractors, auditors, insurers and bankers but only to the minimum extent necessary in connection with our legitimate interests and, where appropriate, subject to confidentiality restrictions.

7. SAFEGUARDING MEASURES

- 7.1 I-Cap Group takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your Personal Data. We work hard to protect your Personal Data from unauthorised access, alteration, disclosure or destruction and we have several layers of safeguarding measures in place, including but not limited to:
 - 7.1.1 technical and organisational controls
 - 7.1.2 written policies and procedures
 - 7.1.3 training of personnel who have access to your Personal Data to maintain the confidentiality of such information
 - 7.1.4 terms and conditions with our contractors, sub-processors and suppliers to protect data to at least the same level as we do



I-CAP GROUP

- 7.1.5 regular monitoring and testing of our security defences to ensure that they continue to be effective against security threats
- 7.1.6 encryption technologies are used to protect data before it is backed up to a remote ISO 27001 compliant secure environment. ***Please note that we do not encrypt communications sent by us to you via the internet so we cannot guarantee that such communication or any attachments will remain secure once in transit.***

8. TRANSFERS OUTSIDE THE EU (IF APPLICABLE)

I-Cap Group may utilise some products or services (*or parts of them*) that may be hosted/stored in non-EU countries. These countries do not always afford an equivalent level of privacy protection. Where this is the case, we will take steps to ensure that those providers use the necessary level of protection for your Personal Data and abide by strict agreements and measures set out by I-Cap Group to protect your Personal Data and comply with applicable data protection laws.

9. CONSEQUENCES OF NOT PROVIDING YOUR DATA

You are not obligated to provide your Personal Data to I-Cap Group; however, as this information is required for us in the provision of our services, our legitimate interests and to comply with our legal obligations we will not be able to offer our services without it.

10. HOW LONG WE KEEP YOUR DATA

I-Cap Group retains Personal Data for as long as it considers is necessary and we have retention policies in place which comply with our legal obligations.



11. LODGING A COMPLAINT

I-Cap Group only processes or authorises the processing of your Personal Data in compliance with this privacy notice and in accordance with applicable data protection laws. If, however you wish to raise a complaint regarding the processing of your Personal Data or you are unsatisfied with how we hold or process your Personal Data, you have the right to lodge a complaint with the relevant supervisory authority as detailed below:

Isle of Man: Information Commissioner Prospect House Prospect Hill Douglas Isle of Man IM1 1ET Tel: +44 1624 693260 Email: ask@inforights.im Web: www.inforights.im	Malta: Office of the Information and Data Protection Commissioner Floor 2, Airways House Triq II – Kbirra Tas-Sliema SLM 1549 Malta Tel: + 356 2328 7100 Email: idpc.info@idpc.org.mt Web: www.idpc.org.mt
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12. CHANGES TO OUR PRIVACY NOTICE

We will be reviewing this privacy notice regularly and may update it from time to time. We reserve the right to update this privacy notice at any time and if we do so we will advise you if we make any material change to it.



I-CAP GROUP

Contact

Tel: +44 1624 665 665

Fax: +44 1624 665 400

Email: privacy@i-capgroup.com

Mail: P.O. Box 665, Ramsey Isle of Man, IM99 4PD

Integrated-Capabilities Ltd is licensed by the Isle of Man Financial Services Authority to provide corporate and trust services.

Incorporated in the Isle of Man

Registered number: 103959C

Registered office: Bridge Chambers, West Quay, Ramsey, Isle of Man, IM8 1DL

Directors: P. K. Perry MBA ACIS TEP, N. A. Z. Bowery, R. A. Cannell TEP, A. M. Dawson FCIS

Integrated-Capabilities (Malta) Ltd is licensed by the Malta Financial Services Authority to act as a trustee, provide fiduciary services and to act as an Administrator of private foundations in terms of Article 43 of the Trust and Trustee Act,; and Retirement Scheme Administrator to Retirement Schemes registered under Retirement Pensions Act 2011, registration pursuant to article 6(1) of the Retirement Pensions Act, 2011.

Incorporated in Malta

Registered Number: C50348

Registered Office: 45/13 Strait Street, Valletta, VLT 1434, Malta

Directors: C. Baxter ACIS, P. K. Perry MBA ACIS TEP, R. A. Cannell TEP, A. M. Dawson FCIS, N. Xuereb TEP BA LL.M. (Lond.) LL.D.