



I-CAP GROUP

PRIVACY NOTICE





I-CAP GROUP

1. KEY DEFINITIONS USED IN THIS PRIVACY NOTICE

- 1.1 **“Artificial Intelligence/AI”** means software-based systems or tools (including machine learning models) that support limited tasks such as data analysis, document drafting, summarisation, classification, or workflow assistance, under appropriate human oversight.
- 1.2 **“Consent”** means permission which is explicitly given or stated by a Data Subject, and which can be withdrawn at any time.
- 1.3 **“Controller”** means the person who determines the purposes and means of processing Personal Data.
- 1.4 **“Criminal Offence Data”** means Personal Data relating to criminal convictions and offences, alleged offences, and related security measures (including, where relevant, sanctions screening and regulatory checks).
- 1.5 **“Data Subject”** means a natural person whose Personal Data is processed in accordance with this Privacy Notice.
- 1.6 **“Data Subject Access Request”** means a request made by a Data Subject to access their Personal Data and to receive information about how it is processed, in accordance with applicable data protection laws.
- 1.7 **“Entity”** means a company, trust, foundation, partnership or similar form of legal arrangement.
- 1.8 **“I-Cap Group”** means I-Cap Group Ltd and its wholly owned subsidiaries, including Integrated-Capabilities Ltd (“ICL”), whether acting individually or collectively, as the context requires.
- 1.9 **“Identifier”** means a piece of information that can be used to establish the identity of a Data Subject.
- 1.10 **“Personal Data”** means any information relating to an identified or identifiable natural person (for example, where the person can be identified directly or indirectly by reference to an identifier).
- 1.11 **“Processor”** means the person responsible for processing Personal Data on behalf of a Controller.
- 1.12 **“Special Category Data”** means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership or data concerning health.
- 1.13 **“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.
- 1.14 **“Usage Data”** means information about how you use our website, servers, network and services.

2. WHO WE ARE AND HOW TO CONTACT US

- 2.1 Integrated-Capabilities Ltd (“ICL”) is a company registered in the Isle of Man under company number 103959C and is licensed by the Isle of Man Financial Services Authority



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to provide corporate and trust services. ICL is also registered with the Isle of Man Information Commissioner for data protection purposes. Its registered office is at Bridge Chambers, West Quay, Ramsey, Isle of Man, IM8 1DL. ICL is a wholly owned subsidiary 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 subsidiaries. References in this privacy notice to "I-Cap Group", "we", "us" or "our" mean I-Cap Group Ltd and/or the relevant subsidiary, affiliate or group entity that is responsible for processing your Personal Data, depending on the nature of your relationship with us and the context in which your Personal Data is processed.

- 2.2 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 our Privacy Officer using the details below:

The Group Privacy Officer
I-Cap Group
PO Box 665
Ramsey
Isle of Man
IM99 4PD
Email: privacy@i-capgroup.com

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 Audio
- 3.1.2 Business Email
- 3.1.3 Criminal Offence Data
- 3.1.4 Date and Place of Birth
- 3.1.5 Driver's Licence Details
- 3.1.6 Gender
- 3.1.7 Home Address
- 3.1.8 Home Telephone Number
- 3.1.9 Identity Card Details
- 3.1.10 Marital Status
- 3.1.11 Mobile Telephone Number
- 3.1.12 Name
- 3.1.13 National Insurance Number
- 3.1.14 Nationality
- 3.1.15 Occupation and Income Details

- 3.1.16 Passport Details
- 3.1.17 Personal Bank Account Details
- 3.1.18 Personal Email
- 3.1.19 Source of Wealth and/or Source of Funds
- 3.1.20 Special Category Data
- 3.1.21 Tax Identification Number
- 3.1.22 Technical Data
- 3.1.23 Usage Data

4. WHY AND HOW WE USE YOUR PERSONAL DATA

- 4.1 Our lawful basis for processing Personal Data and the purposes for which it may be 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 and our respective obligations thereunder.

- 4.1.2 Lawful basis: **Legal obligation**

Purpose: To enable us to meet our professional, compliance & statutory 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 assess and seek to maintain 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.

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: Where we rely on your Consent for a specific purpose (which may include Special Category Data in limited circumstances), we will explain the purpose at the point we request your Consent. You may withdraw your Consent at any time (without affecting the lawfulness of processing before withdrawal). We do not rely on Consent where another lawful basis is more appropriate.

- 4.2 Where we process Special Category Data, we do so only where this is necessary and permitted by applicable data protection law. This may include processing information relating to employment matters, occupational health, legal claims, protecting an individual's vital interests, or where a person has given their explicit consent for a specific purpose. We apply appropriate safeguards to protect this information and ensure that it is processed only by authorised personnel who need access to it for legitimate business, legal or regulatory purposes.

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 basis for processing your Personal Data and the purpose(s) for which it is processed;
- 5.1.3 the categories of Personal Data concerned;
- 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 (for example, where you contest accuracy or object to processing) in accordance with applicable data protection laws. In addition, you may object to direct marketing from us. Where we rely on your Consent, you have the right to withdraw that Consent at any time. Where applicable, you also have the right to data portability and the right to be informed about, and (where relevant) to object to, automated decision-making and profiling. You also have the right to lodge a complaint with the Isle of Man Information Commissioner, as set out in section 12.

- 5.4 We will respond to valid rights requests without undue delay and in any event within one month of receipt. This period may be extended by up to two further months where necessary, taking into account the complexity and number of requests, in which case we will inform you of any extension and the reasons for it.

- 5.5 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 an important



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safeguard designed to protect your Personal Data and reduce the risk of unauthorised disclosure.

- 5.6 We do not use AI to carry out fully automated decision-making that produces legal or similarly significant effects on individuals without meaningful human involvement and appropriate safeguards.
- 5.7 We do not carry out profiling using AI that produces legal or similarly significant effects on individuals without meaningful human involvement. Where automated processing constitutes profiling, appropriate safeguards are applied, including meaningful human review.

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, 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 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;
 - 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. This may include access by authorised personnel in other I-Cap Group locations where required for service delivery, security, compliance or business continuity, subject to appropriate access controls, confidentiality obligations and data protection safeguards.

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



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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 on their confidentiality responsibilities
- 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
- 7.1.5 regular monitoring and testing of our security defences to assess their effectiveness and identify improvements 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 the security of internet communications cannot be guaranteed. Where appropriate, we use secure channels and safeguards (for example, secure portals, access controls and encryption in transit where supported) for the transmission of sensitive information

8. USE OF ARTIFICIAL INTELLIGENCE

- 8.1 I-Cap Group may use Artificial Intelligence (AI) tools as part of limited internal business processes, including administrative support, document management, summarisation, analytical assistance and IT/security monitoring, with appropriate human oversight.
- 8.2 AI tools are used to assist our personnel and do not replace human decision-making in relation to clients, employees, or other Data Subjects. Decisions with legal or similarly significant effects are subject to appropriate human review.
- 8.3 Where AI tools process Personal Data, this is done in line with this privacy notice, our internal governance frameworks, and applicable data protection laws. We take reasonable steps to support the responsible, secure and proportionate use of AI tools.

9. TRANSFERS OUTSIDE THE ISLE OF MAN (IF APPLICABLE)

- 9.1 The Isle of Man is recognised by the EU and the UK as providing an adequate level of protection for Personal Data. This supports the transfer of Personal Data from the EU or the UK to the Isle of Man without additional international transfer safeguards solely because of that transfer. Our obligations under applicable data protection laws, including the Applied GDPR, continue to apply.
- 9.2 I-Cap Group may utilise some products or services (or parts of them) that may be hosted, processed or stored in countries outside of the Isle of Man. These countries may not always afford an equivalent level of privacy protection. Where we transfer Personal Data internationally, we will take reasonable steps to put in place an appropriate transfer mechanism, such as an adequacy decision/regulation, standard contractual clauses or other approved transfer mechanisms where required by applicable data protection law, together with any required transfer risk assessment and supplementary measures. We will also take reasonable steps to require our providers and group entities to be subject to appropriate contractual, confidentiality, and security obligations designed to protect your Personal Data and comply with applicable data protection laws.



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10. 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.

11. HOW LONG WE KEEP YOUR DATA

I-Cap Group retains Personal Data only for as long as necessary for the purposes for which it was collected, including to meet legal, regulatory, tax, accounting and reporting requirements, to manage our relationship with you, and to establish, exercise or defend legal claims. Retention periods vary depending on the category of data and the purpose of processing; we apply documented retention and deletion procedures (including a retention schedule) and will securely delete or anonymise Personal Data when it is no longer required.

12. LODGING A COMPLAINT

You may lodge a complaint with the Isle of Man Information Commissioner, which is the relevant supervisory authority for I-Cap Group's Isle of Man data protection obligations.

Information Commissioner
Prospect House
Prospect Hill
Douglas
Isle of Man
IM1 1ET

Tel: +44 1624 693260
Email: ask@inforights.im
Web: www.inforights.im

13. 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.

(PN 2021 (2026-08-01))



I-CAP GROUP

Contact

Tel: +44 1624 665 665

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