

Winterflood

Privacy Policy

This Privacy Policy (together with our Data Protection Policy, applicable Customer Terms and any other documents to which we refer) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

As Data Controller, Winterflood Jersey Limited (“WJL”) treats all matters relating to personal data with the utmost importance and aims to strictly comply with the requirements of the **Data Protection (Jersey) Law 2018**, and any other applicable laws (the “Law”).

Any information or material sent to us will be handled in a manner consistent with legal and regulatory requirements. The purpose of this Privacy Policy is to give you a better understanding of:

- what information we collect;
- how we use that information;
- how this information is shared; and
- other useful privacy and security related matters.

Information we collect about you (our “Privacy Policy”)

We will collect and process the following data about you:

- **Information you give us.** This is information about you that you give us by corresponding with us by phone, e-mail or otherwise. This information may include, but is not limited to your name, postal address, e-mail address, date and place of birth, phone number and any other details as might be requested from you for the purpose of continued use of our services.
- **Information we collect about you.** Through your interactions with us, we may collect information that relates specifically to the way we are contractually engaged. We may furthermore process personal data for the purposes of the legitimate business interests pursued by us. Such legitimate interests may include developing and improving our services or to strengthen our relationship with you. We may provide you with communications or information regarding our service offering which we think will be interesting for you. When we process your personal data for our legitimate business interests, we will consider and balance any potential impact on you and your rights under the relevant data protection and any other relevant law. Whenever we process personal data for these purposes you have the right to object to this way of processing.

Winterflood Jersey Limited
Dialogue House, 2-6 Anley Street, St Helier, Jersey JE2 3QE
Registered Number 158855

Winterflood Jersey Limited is authorised and regulated by the Jersey Financial Services Commission

- **Information we receive from other sources.** This is information we may receive about you relating specifically to the way we are contractually engaged. Not all the personal information we hold about you will always come directly from you. We may also collect information from third parties such as our partners, service providers and publicly available websites to comply with our legal and regulatory obligations.
- **Special Category Data.** In certain circumstances, to provide some services to you, it may be necessary for us to process special categories of data about you. Data Protection Laws define special categories of data as data revealing your racial or ethnic origins, your political opinions, religious or philosophical beliefs, any trade union membership you may hold and data concerning your health, your sex life or sexual orientation. We will only ever process such data in a manner that is permitted under Data Protection Laws. This means that, in some circumstances, we may need you to give us your explicit consent to process this data, which we will request where relevant. In most circumstances, we will not need you to send us any reports or documents about you that contain any special categories of data about you. You should never send these to us unless we specifically ask you to do so.

How do we use this information?

We process personal data for business-related purposes such as on-boarding you as a client of WJL and to assist your relationship with third parties such as banks. We also process personal data to evaluate and manage risk to our business and retain personal data for legal and compliance reasons, such as the prevention, detection or investigation of a crime or fraud. We may also use personal data as we otherwise believe to be necessary or appropriate: (a) under applicable law, and (b) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.

Disclosure of data

You agree that we have the right to share your personal information with any member of WJL, which could also mean our subsidiaries, our ultimate holding company and its subsidiaries.

You agree that we have the right to share your personal information with third parties on the strict condition that this relates specifically to the purpose of the proper performance of the services we provide to our clients. We enter into data processing agreements with such subcontractors to ensure that they process your data, on our behalf, with the same level of security and confidentiality as applied by us. We may furthermore disclose or transfer personal data when we have received your consent to do so.

We will share personal information when we believe it is required, such as:

- To comply with legal obligations and respond to requests from government agencies, including law enforcement and other public authorities.
- In the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets, or stock (including in connection with any bankruptcy or similar proceedings).

Storage of data

Data will be held either in hard or soft copy form within our premises or with our trusted business partners or cloud providers. The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (EEA).

Retention of data

We retain personal information for as long as we reasonably require it for legal or business purposes.

Security of data

We recognise that security and data protection is an area of vital importance for all our customers, so it is important to us that you have confidence in the security of your personal details. We are committed to employing security measures to protect your information from access by unauthorised persons and to prevent accidental or unlawful processing, disclosure, destruction, loss, alteration and damage. To help us in this regard, we employ the services of an accredited cloud provider.

The transmission of information via the internet / email is not always completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Privacy Policy changes and questions

Changes to this Policy will be updated on www.winterfloodbusinessservices.com/winterflood-jersey

Your rights

The law gives you the right to access information held about you. You can exercise the right at any time by contacting us at +44 (0)20 3100 0000 or wjl.enquiries@winterflood.com

Cookies

Cookies are used on our website. A cookie is a small text file which asks permission to be placed on your computer's hard drive through your web browser. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting by accepting, rejecting and declining cookies.

The "help" portion of the toolbar on most browsers will tell you how to prevent your browser from accepting new cookies, how to have the browser notify you when you receive a new cookie, or how to disable cookies altogether. If you choose to change these settings, you may find that certain functions and features will not work as intended. This may prevent you from taking full advantage of the website.