



**The Security Centre Ltd.**, and its subsidiaries (together "TSCL/we/our") is committed to protecting your privacy. In this policy, we set out how TSCL collects personal data, how it uses and shares it, and the rights and choices you have in relation to the personal data held and processed by TSCL. It should be noted that we do not transfer personal information you provide to any third parties for their own direct marketing use.

Where applicable, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

This Privacy Policy is separate and in addition to client confidentiality obligations we may owe you. Please refer to our terms and conditions, applicable to your engagement, for further details.

We may collect Information from you when you correspond with us or engage our services. We may also collect information as a result of your relationship with one or more of our team, or otherwise in the general course of our business. In each case your data will be controlled by TSCL.

#### **The types of personal information we collect**

We collect different personal information for different reasons - it is not our intention to collect excessive amounts of personal information, but the types of information collected may include:

- your personal identification information and contact information, which may include: your name, passport information, convictions, politically exposed person (PEP), personal data available in the public domain, physical address, postal address, telephone numbers, email address and such other information necessary for TSCL to carry out its obligations;
- information on relevant family members and your business relationships;
- education, professional qualifications and employment information; and
- financial information, sources of wealth and your assets and bank details.

If you apply for a position with TSCL we may also collect personal information relating to your past employment, professional qualifications and education, your nationality, health, criminal records and immigration/residential status. We may also gather information from third parties in the form of references and any other information that may be obtained during the recruitment process.

#### **How we collect your personal data?**

Personal data is collected at different times and from different sources including but not limited to:

- when you or your organisation contact us to consider engaging our services;
- information gathered through our client due diligence procedures as part of our compliance requirements with regulatory authorities;
- through email, fax or telephone communication;
- from third parties; and
- when you or your organisation provides services to us or offer to do so.

#### **How will we use your personal data?**

TSCL understands that personal data is sensitive and is committed to protecting and respecting your privacy. We provide fiduciary, corporate and other professional services to our clients and we use your personal data for these purposes.

Normally the purposes for which we use your personal data will be clear when we collect data. TSCL will only use your personal information to:

- perform a contract that we have with you;
- conduct administrative or operational processes within our business;
- comply with any legal obligation where TSCL is required to process your personal information - such as keeping records for tax purposes or providing information to a governmental institution, regulatory body or law enforcement agency;
- share with third parties relevant to the services that we provide. This may include, but is not limited to, counterparties to transactions or litigation (including law firms acting for other parties), other professional service providers, tribunals or courts;
- process and respond to requests, enquiries or complaints received from you or someone connected to you;
- establish, exercise or defend the legal rights of TSCL or for the purposes of legal proceedings;
- manage and administer your or your organisation's business relationship with us, including processing payments, billing and collection;
- for other legitimate business purposes; and
- should you apply for a position with us, to review and process your application.

#### **How we may share the information we collect?**

We do not share personal information with unaffiliated third parties, except as necessary for our legitimate professional and business needs, to carry out your request and /or as required or permitted by law or professional standards. This would include:

- responding to requests from regulatory bodies or law enforcement agencies where it is necessary or prudent to comply with applicable laws or government regulations;
- sharing with TSCL' service providers, advisors or other third parties if we merge, sell, liquidate or transfer all or a portion of our assets;
- comply with any legal obligation where TSCL is required to process your personal information - such as keeping records for tax purposes or providing information to a governmental institution, regulatory body or law enforcement agency;
- sharing with other third parties as outlined in the section above; and
- should you apply for a position with us, disclosing your personal information for the purposes of seeking references and confirmation of the details that you have provided.

#### **Retention of personal information and security**

Your personal information will be retained for as long as required:

- for the purpose for which the personal information was collected;
- in order to satisfy any reporting or accounting obligations; and
- as required by data protection laws and any other applicable laws or regulatory requirements.

TSCL has reasonable security policies and procedures in place to protect personal information from unauthorised loss, misuse, alteration or destruction. Despite our best efforts, however, security cannot be absolutely guaranteed against all threats. To the best of our ability, access to your personal information is limited to those who have a need to know. Those individuals who have access to the data are required to maintain the confidentiality of such information. We may keep your personal data in our electronic systems and in paper files.

### **Access to your personal data**

If you have submitted information to TSCL, you have the following rights:

- to access that data and port (transfer) such personal information;
- to rectify personal information where the information we hold about you is incorrect;
- to restrict the use of personal information;
- to request that personal information is erased;
- to object to processing of personal information; and
- submit a complaint if you have concerns about the way in which we are handling your data to [info@security.ky](mailto:info@security.ky), to the Information Commissioner's Office in the UK (<https://ico.org.uk>) or the data protection authority in the EU member state of your usual place of residence

We cannot be responsible for any loss that may arise due to us having any inaccurate, incomplete, inauthentic or otherwise deficient personal data that you or a third party have provided to us.

### **Inaccurate or amended information**

Please let us know as soon as possible if any of your personal information changes (including your correspondence details). Failure to provide accurate information or to update information when it changes may have a detrimental impact upon our ability to provide services to you.

### **Changes to our Privacy Policy**

This Privacy Policy was last updated on 22 May 2018. We have the right to update the contents of this Privacy Policy from time to time to reflect any changes in the way in which we process your personal data or to reflect legal requirements as these may change.